Organizer: Pirzadeh, Michelle[Pirzadeh.Michelle@epa.gov]

From: Pirzadeh, Michelle

Location: ET Conference Room; VTC w/AOO staff

Importance: Normal

Subject: HOLD: Calista Corp re: Donlin Gold Mine

 Start Time:
 Thur 9/15/2016 9:00:00 PM

 End Time:
 Thur 9/15/2016 10:30:00 PM

Required Attendees: Allnutt, David; Soderlund, Dianne; Jen, Mark; LaCroix, Matthew; Littleton, Christine; Szerlog, Michael;

Fordham, Tami

Optional Attendees: Tyson, Linda

PLEASE DO NOT FORWARD THIS MEETING; IF ADDITIONAL ATTENDEES ARE REQUIRED, NOTIFY ORA ADMIN STAFF.

Hold for Calista Corp meeting 2:00-3:30 pm

POC: David Allnutt

VTC meeting w/AOO Large

Organizer: Allnutt, David[Allnutt.David@epa.gov]

From: Pavy, Jonathan

Location: R10Sea-ConfLineMM Personal Privacy / Ex. 6 R10Sea-Room-20Small/R10-Rooms-Service-Center

Importance: Normal

Subject:Donlin Gold Project EISStart Time:Wed 3/5/2014 8:15:00 PMEnd Time:Wed 3/5/2014 9:00:00 PM

Required Attendees: Reichgott, Christine; Szerlog, Michael; Soderlund, Dianne; Marcy, Ken; Jen, Mark

MML Personal Privacy / Ex. 6

Anyone calling from outside of EPA phone system must dia Personal Privacy / Ex. 6 first, then the MML

Organizer: Laabs, Chris[Laabs.Chris@epa.gov]

From: Laabs, Chris

Importance: Normal

Subject: draft powerpoint presentation on Donlin

Start Time: Wed 10/4/2017 8:00:00 PM **End Time:** Wed 10/4/2017 8:30:00 PM

Required Attendees: Nogi, Jill
Optional Attendees: Allnutt, David

Jill,

I'll save the time in case we need to touch base.

Thanks! Chris

From: Nogi, Jill

Sent: Tuesday, October 03, 2017 3:47 PM
To: Laabs, Chris < Laabs.Chris@epa.gov>
Cc: Allnutt, David < Allnutt.David@epa.gov>
Subject: draft powerpoint presentation on Donlin

Chris – I'm on a call now with CEQ and in meetings all afternoon. We could set up time to talk tomorrow – I'm open right now between 1 and 2 Pacific time tomorrow, and it would be great to connect on this if you're free then.

There's two slides in here on wetlands, the other slides are about the project more broadly. Thanks for your time to review and comment!

The talking points are included for David to use if he wants to - he and I talked about using this presentation as a handout and having him walk through it more informally in about 10 minutes or so.

Jill

Jill A. Nogi, MPH | Manager Environmental Review and Sediment Management Unit EPA Region 10 | Office of Environmental Review and Assessment 1200 6th Avenue, Seattle WA, 98101 (206) 553-1841 Organizer: Jen, Mark[Jen.Mark@epa.gov]

From: Jen, Mark

Location: R10AOO-CfLr Ex. 6 R10AOO-Room-Raven-25-VTC/R10-Rooms-AOO

Importance: Normal

Subject: REMINDER/UPDATE: Donlin Gold Project Meeting - EPA, Corps & Donlin Gold LLC

Start Time: Wed 9/6/2017 9:00:00 PM **End Time:** Thur 9/7/2017 12:00:00 AM

Required Attendees: Nogi, Jill; Szerlog, Michael; LaCroix, Matthew; Thomas, Lee; Kissinger, Lon; McAlpine, Jay; Eckley, Chris;

Repasky, Ted; Darden, Richard L CIV USARMY CEPOA (US); Kennedy, Timothy A CIV USARMY USACE

(US); Craig, Bill; Graham, Dan; Weglinski, Gene

Optional Attendees: Allnutt, David; Fordham, Tami; Pepple, Karl; Isaacs, Jon; Thiesing, Mary

Donlin Meeting EPA Hot Topics 9-6-2017.docx

Attached is the slightly rearranged agenda - updated attendees list .

Let me know if you have any questions.

Thanks

Mark

DONLIN GOLD PROJECT PRELIMINARY FEIS

EPA Hot Topics Meeting

September 6, 2017

1:00 pm to 4:00 pm ADT / 2:00 pm to 5:00 pm PDT

Anchorage – EPA Raven Conference Room 569 (5th FL) / Seattle – Denali Conference Room (21st FL)

Conference Line: Ex. 6 Code: Ex. 6

AGENDA

Introductions / Remarks

(10 MINUTES)

■ CLEAN AIR ACT (30 MINUTES)

Minimize and mitigate unavoidable impacts to air quality and ecological/human health

- Air emissions modelling
- Fugitive Dust: mercury, arsenic, antimony
 - ☐ Fugitive Dust Control Plan (Mine Site) sampling and testing
- Material Sources geochemical characterization Design feature (A11) sampling/testing fugitive dust

SAFE DRINKING WATER ACT

(30 MINUTES)

Minimize and mitigate unavoidable impacts to groundwater, USDW, and ecological/human health

- Donlin Camp (AK2271983) and the Village of Crooked Creek
- Underground Sources of Drinking Water Mine Site impacts during construction, operations, closure
 - ADEC WQS for groundwater
- Monitoring well network upgrade to allow adequate data for assessment of mine impacts during operations/closure

■ CLEAN WATER ACT (30 MINUTES)

Minimize and mitigate unavoidable impacts to surface water quality and quantity, and ecological/human health

- Crooked Creek reductions in surface and groundwater
- Open Pit Mine Dewatering –Design feature (Mit 40) Slurry Wall
- Ore Processing Water the Kuskokwim River
- Spill Response Planning mercury, cyanide, tailings
- Material Sources = geochemical characterization Design feature (A11) sampling/testing of water quality

National Environmental Policy Act

(30 MINUTES)

Public disclosure and support federal decisions affecting the environment and ecological/human health

- Focused Risk Assessment/Human Health Risk Assessment
 - Baseline information mercury methylation and other COPC
- Ecological Risk Assessment evaluate other sources, pathways, endpoint for exposure to COPC
- Financial Assurance Premature Mine Closure Scenario
- Permafrost Impacts direct and indirect
 - Protect mine and facility infrastructure TSF and WRF, gravel access roads/pads, pipeline
 - Quantify the volume (tons) of permafrost thaw/melt
 - ☐ Quantify GHG emissions (CO₂-e tons) from permafrost thaw/melt
 - Quantify indirect wetlands impacts from permafrost thaw/melt
- Subsistence Concerns and Conflicts Donlin Advisory and Technical Review Oversight Committee (DATROC)
- Non-Invasive Species Management Plan (Pipeline) expand to all project facilities and marine transportation

■ NEXT STEPS — TIMELINES (15 MINUTES)

TENTATIVE ATTENDEES

U.S. Army Corps of Engineers Alaska District	Donlin Gold, LLC	U.S. Environmental Protection Agency Region 10	
		Seattle	Anchorage
Richard Darden, Project Manager Timothy Kennedy, Deputy Project Manager	Dan Graham, Project Manager Gene Weglinski, Sr. Permitting Coordinator	David Allnutt, Office Director Environmental Review & Assessment Jill Nogi, Manager	Tami Fordham, Deputy Director Alaska Operations Office
AECOM		Michael Szerlog, Manager Lon Kissinger, HH Risk Assessor Chris Eckley, Mining Geochemist	Mark Jen, PM/NEPA Matthew LaCroix, Wetland
Bill Craig, Project Manager Jon Isaacs, Principal in Charge Elizabeth Bella, Deputy Technical PM Nancy Darigo — Physical Environment Lead		Lee Thomas, Hydrologist Ted Repasky, Hydrogeologist Jay McAlpine, Air Modelling Karl Pepple, Air Quality	

Organizer: R10-OERA Calendar[R10-OERA_Calendar@epa.gov]

From: R10-OERA Calendar

Location: R10AOO-Room-Raven-25-VTC/R10-Rooms-AOO; R10Sea-RoomSup-14Elwha-VTC - Setup/R10-Rooms-

Service-Center; R10Sea-Room-14Elwha/R10-Rooms-Service-Center

Importance: Normal

Subject: Donlin Gold Mine, Continued
Start Time: Thur 8/31/2017 10:00:00 PM
End Time: Thur 8/31/2017 11:00:00 PM

Required Attendees: Nogi, Jill; Soderlund, Dianne; Jen, Mark; Bachman, Brenda; Owens, Kim; Kissinger, Lon; Repasky, Ted;

Allnutt, David; Thomas, Lee; LaCroix, Matthew; Thiesing, Mary; Godsey, Cindi; Grass, Running; Pepple, Karl;

McAlpine, Jay; Szerlog, Michael; Stern, Allyn; Steiner-Riley, Cara

R10 Seattle 14 Elwha GCI / R10 Anchorage Raven Room

Conference line: Personal Privacy / Ex. 6

Organizer:	R10-OERA Calendar[R10-OERA_Calendar@epa.gov]		
From:	R10-OERA Calendar		
Location:	R10AOO-Room-Raven-25-VTC/R10-Rooms-AOO; R10Sea-RoomSup-14Elwha-VTC - Setup/R10-Rooms-Service-Center; R10Sea-Room-14Elwha/R10-Rooms-Service-Center; Conference Line: Ex. 6 Code: Ex. 6		
Importance:	Normal		
Subject:	Donlin Gold Mine		
Start Time:	Wed 8/23/2017 6:30:00 PM		
End Time:	Wed 8/23/2017 7:30:00 PM		
Required Attendees:	Nogi, Jill; Soderlund, Dianne; Jen, Mark; Bachman, Brenda; Owens, Kim; Kissinger, Lon; Repasky, Ted; Allnutt, David; R10Sea-ConfLine Ex. 6 Thomas, Lee		
Optional Attendees:	LaCroix, Matthew; Thiesing, Mary; Godsey, Cindi; Eckley, Chris; Grass, Running; Pepple, Karl; McAlpine, Jay Szerlog, Michael; Shaw, Hanh; Stern, Allyn; Steiner-Riley, Cara		
·	: 14 Seattle 14 Elwha GCI / R10 Anchorage Raven Room Ex. 6 Code: Ex. 6		

Organizer: Jen, Mark[Jen.Mark@epa.gov]

From: Jen, Mark

Location: EPA - Anchorage Large Conference Room 526

Importance: Normal

Subject: REMINDER: EPA/Donlin Meeting Agenda

Start Time: Wed 7/26/2017 10:00:00 PM **End Time:** Thur 7/27/2017 12:30:00 AM

Required Attendees: Nogi, Jill; Shaw, Hanh; Soderlund, Dianne; Fordham, Tami; Godsey, Cindi; Kissinger, Lon; Eckley, Chris;

dgraham@DonlinGold.com; gweglinski@DonlinGold.com; kparkan@DonlinGold.com

Optional Attendees: Allnutt, David; Thiesing, Mary; Ron Rimelman

Agenda EPA-Donlin Meeting 7-26-2017.pdf

Greetings Everyone!

Attached is the Agenda for our meeting tomorrow.

The Anchorage EPA Large Conference Room VTC is down and the Raven Conference Room is already booked. We will not have VTC capabilities to connect to Seattle. For EPA folks in Seattle, please meet in the Alder Conference Room (15th Floor) and we will connect via telephone and adobe connect.

See you tomorrow. Please forward this meeting invitation to anyone I have missed.

Thank you!

Mark

Donlin Gold and EPA Meeting July 26, 2017, 2:00 pm- 4:30 pm ADT (3:00 pm - 5:30 pm PDT) Federal Building

Anchorage - EPA Large Conference Room 526 Seattle - EPA Alder Conference Room (15th FL)

ATTENDEES

Donlin Gold – Dan Graham, Gene Weglinski, Kurt Parkan

NovaGold - Ron Rimelman

Calista - Rosie Barr

EPA Region 10 (in person) - Mark Jen, Jill Nogi, Tami Fordham

EPA Region 10 (Seattle) - Cindi Godsey, Lon Kissinger, Chris Eckley, Mary Anne Thiesing, Hanh Shaw

AGENDA

- 1. Introductions meet and greet with new/existing managers/staff 5 min
- 2. Overview of the Donlin Gold LLC's Proposed Project (PowerPoint) 15 min
- 3. Community Engagement with the Tribes and the Public 15-20 min
 - a. Examples of past and on-going community engagement (e.g., exploration staffing, Barge Plan);
 - b. Donlin's plans for community engagement/involvement during the mine life and post closure?
- 4. Project Items 15-20 min
 - a. Changes to the proposed project as a result of the environmental review process and public comments;
 - b. Actions/plans Donlin has taken/prepared to address agency/public comments; (e.g., Financial Assurance, FMEA development, spill risk scenarios, etc.)
 - c. Compensatory Mitigation Plan Current concepts and status
- 5. Financial Assurance SCRE estimate and ADNR/ADEC bond vs. CERCLA process 10 min
- **6. EPA's current activities and future plans** 20-30 min
 - a. PFEIS and FEIS (DEIS was rated under section 309)
 - b. Permit Reviews/Oversight

 DA permit review

 State APDES Permit

From: Allnutt, David

Importance:NormalSubject:Donlin?

 Start Time:
 Thur 2/1/2018 10:00:00 PM

 End Time:
 Thur 2/1/2018 10:30:00 PM

Organizer: McLerran, Dennis[mclerran.dennis@epa.gov]

From: McLerran, Dennis

Location: 21 ET Conf Room + VTC for AOO

Importance: Normal

Subject: Meeting with Stan Foo/Donlin Gold

Start Time: Thur 5/21/2015 9:30:00 PM **End Time:** Thur 5/21/2015 10:30:00 PM

Required Attendees: Allnutt, David; Soderlund, Dianne

Optional Attendees: Jen, Mark; Szerlog, Michael

Donlin Gold Meeting with Dennis McLerran.pdf
Donlin Gold Meeting with Dennis McLerran.pdf

Donlin EPA RA Briefing 052115 pdf.pdf

Donlin EPA RA Briefing 052115.pptx

Subj: Meeting with Stan Foo, Donlin Gold regarding an update on the NEPA process for Donlin Gold project in AK. Stan will send an agenda prior to the meeting

Donlin POC: Stan Foo, 907-273-0200; sfoo@barrick.com or sfoo@donlingold.com

Priority: High - Stan and staff will be traveling into Seattle for this meeting

Participants:

Stan Foo, General Manager Nick Enos, Permitting Manager Patty McGrath, Consultant for Donlin

Scheduled 4/30/15 - MM

Donlin Gold Project Update



Briefing for Regional Administrator, EPA Region 10

EPA Region 10 Office - Seattle, WA

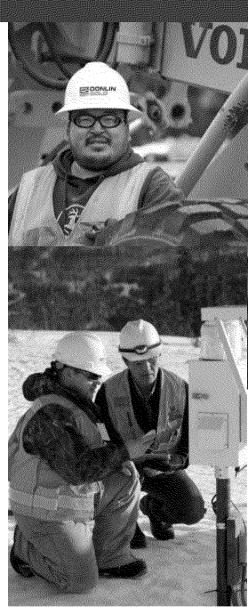
May 21, 2015



Donlin Gold Partners



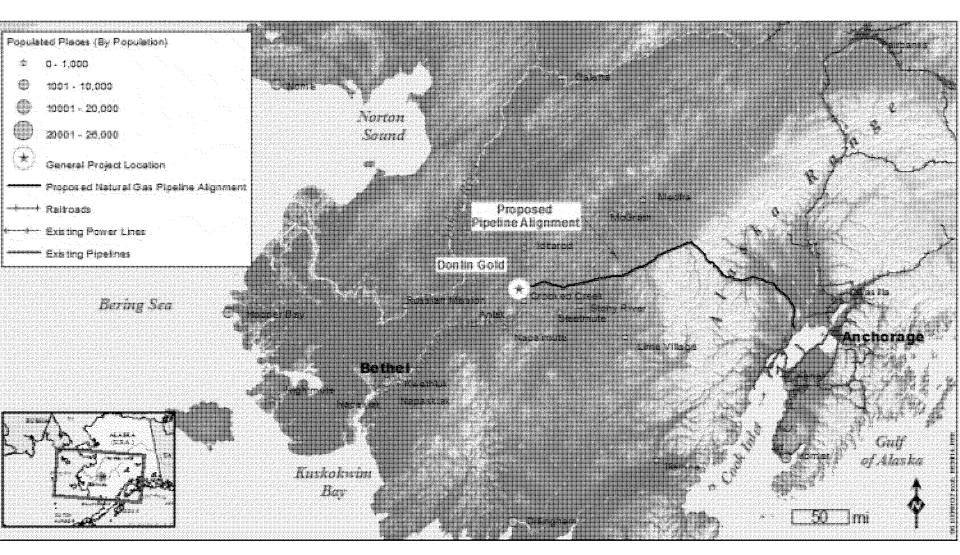
- Donlin Gold LLC
 - Barrick Gold U.S. (50%)
 - NovaGold Resources Alaska (50%)
- Calista Corporation
 - ANCSA Regional Corporation
 - Mining Lease Agreement
- The Kuskokwim Corporation (TKC)
 - ANCSA Village Corporation
 - Surface Use Agreement



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Location Map





Project Overview



Reserves: 33.9 million ounces at 2.09 g/t gold

• Mine Life: 27.5 years

• **Production:** ~ I.I million ounces/year

• **Mining:** Open-pit ~420,000 tons/day (5.5:1 strip)

• Milling: 59,000 tons/day (float/POX/CIL)

Tailings: Fully-lined conventional storage facility

Infrastructure: 5,000 ft runway, 30 mile road, port,

camp accommodations for 600

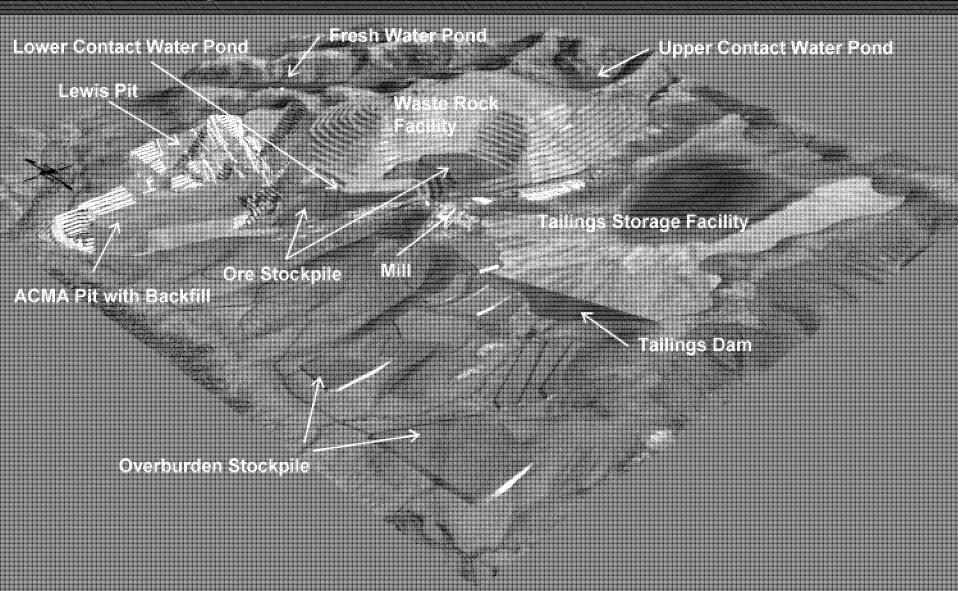
• Logistics: Supplies barged up Kuskokwim River

Power: ~150MW on-site generation using natural gas

supplied by 315 mile natural gas pipeline

Site Layout





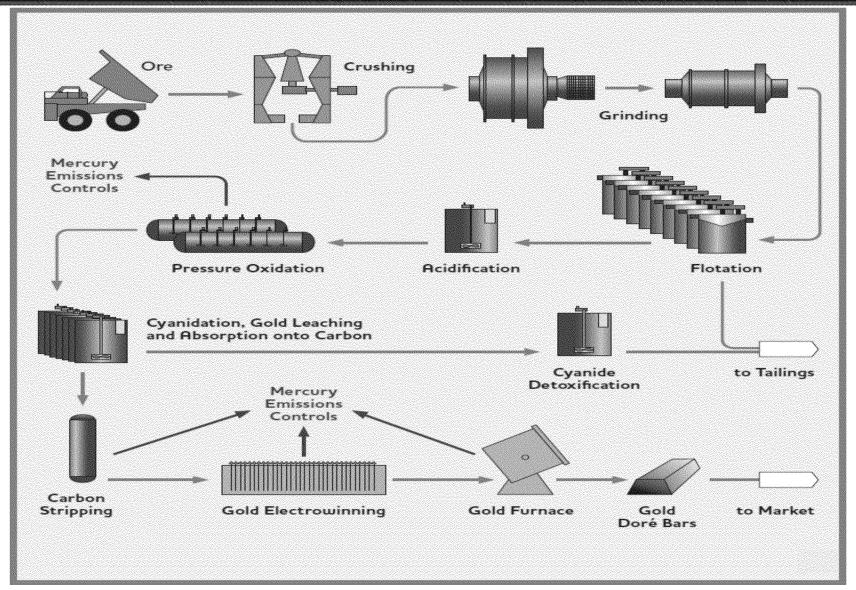
Mill Layout





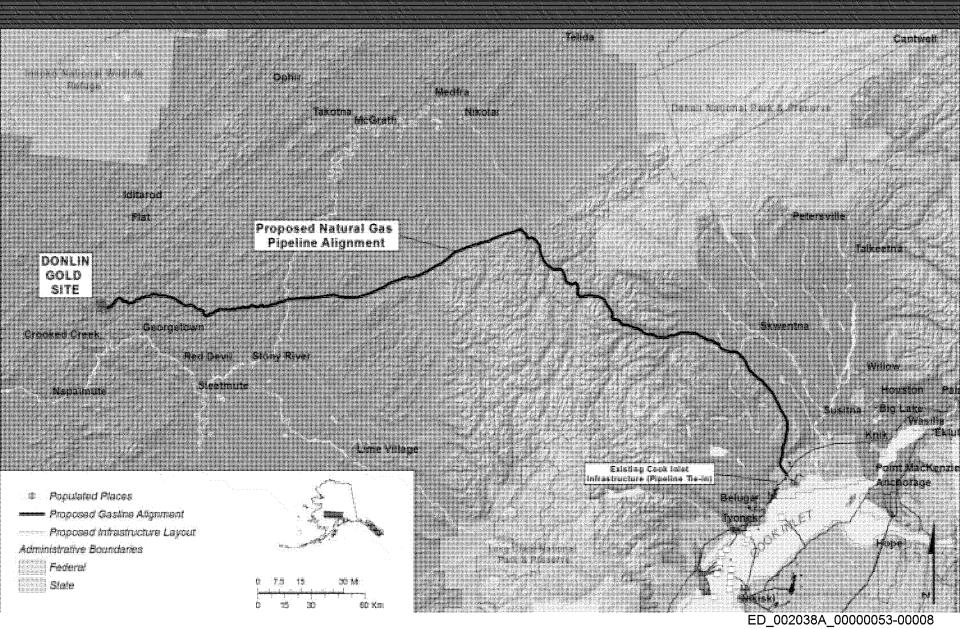
Process Flowsheet





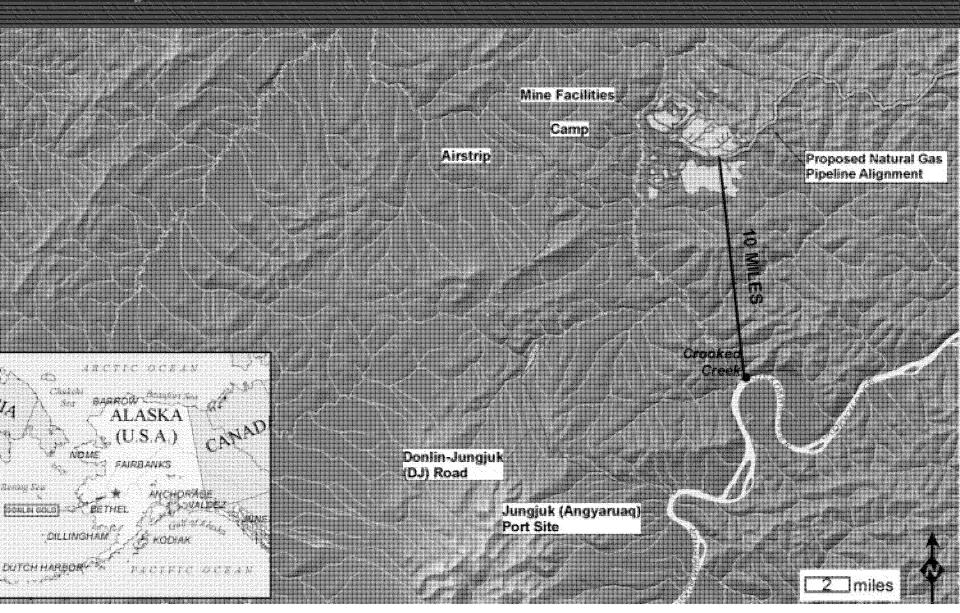
Natural Gas Pipeline Route





Project Infrastructure

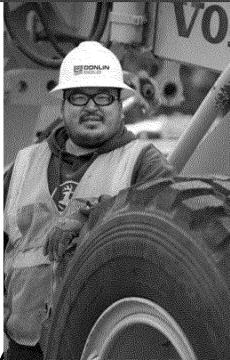




Economic Benefits



- Construction (3-4 years)
 - Payroll:~\$375 million/year
 - Workforce: >3,000
- Operations (>27 years)
 - − Workforce: ~ 900
 - Direct Payroll: ~\$100 million/year
 - Indirect and induced payroll: ~\$60 million/y
 - Royalties to Calista and TKC
 - Statewide distribution of revenue through 7(i)
 - Mining license and corporate income taxes to State



Permitting



Milestones

- Submitted Section 404
 Application and Plans of
 Operations July 2012
- Corps published NOI -December 2012
- Public Scoping completedMarch 2013
- Draft Environmental Impact
 Statement ~ 2015

Alaska Dispatch News

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Alaska's Donlin Gold Project initiates permit process

Alaska Dispatch | August 8, 2012

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On Tuesday, mining giant NovaGold Resources announced that Donlin Gold LLC has formally initiated the process of permitti Gold Project in Southwest Alaska. The company has submitted a Plan of Operations and a Wetlands Permit Application under of the U.S. Clean Water Act to federal and state regulators.

The Donlin Gold project is a flagship property of NovaGold and one of the largest known undeveloped gold deposits in the wor project is located about 120 miles from the regional hub of Bethel, Alaska, 12 miles up a remote valley near the Kuskokwim Riv Crooked Creek.

RELATED:

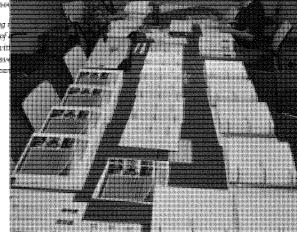
High cost of operating in remote Alaska threaten Donlin gold mine

Donlin mine moves slowly toward reality

problemency In the anno

Permitting i Oh epole of modest, wit we will have

Donlin Gold's value. We bettere we me through parmitting



NovaGold says it and its partner Barrick Gold are committed to advancing the Donlin Gold project

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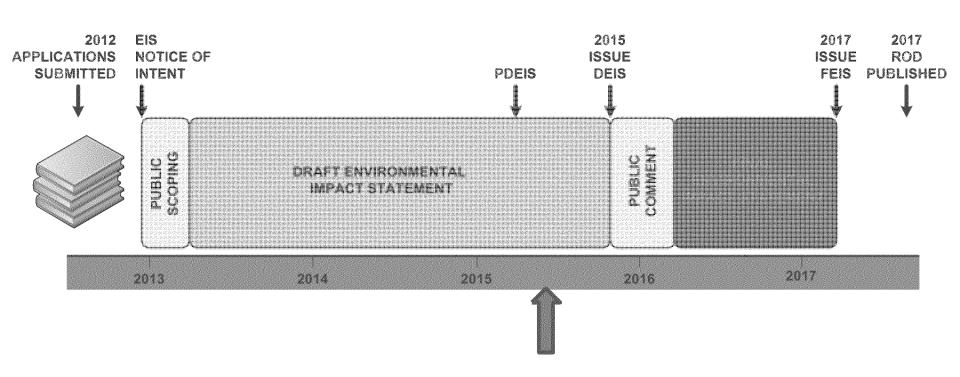
DONLIN

EIS Cooperating Agencies

- Corps of Engineers (Lead Agency)
 - AECOM (EIS Contractor)
- Federal Agencies
 - Environmental Protection Agency
 - Bureau of Land Management
 - US Fish and Wildlife Service
 - Pipeline & Hazardous Materials Safety Administration
- State of Alaska
 - Coordinated by Department of Natural Resources
- Tribal Cooperators
 - Village of Crooked Creek, Native Village of Chuathbaluk, Native Village of Napaimute, Knik Tribal Council, Village of Aniak, and Akiak Native Community

EIS Schedule





EIS Alternatives Development

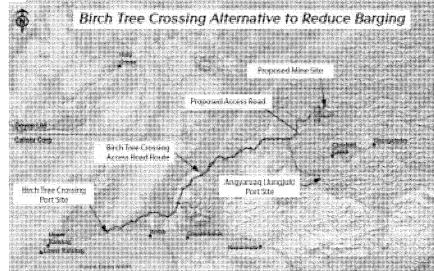


PDEIS Alternatives

- No Action Alternative
- Proposed Project
- Reduced Barging Alternatives
 - Alternative port location, LNG haul trucks, diesel pipeline
- Mine Site Alternatives
 - Drystack tailings, excess water discharge
- Pipeline Route Alternatives

Alternatives Development Process

- · Step 1: Identify Scoping Issues
- Step 2: Identify Screening Criteria
- . Step 3: Address Concerns through Options
- . Step 4: Screen All Options
- · Step 5: Create Action Alternatives



Community Engagement



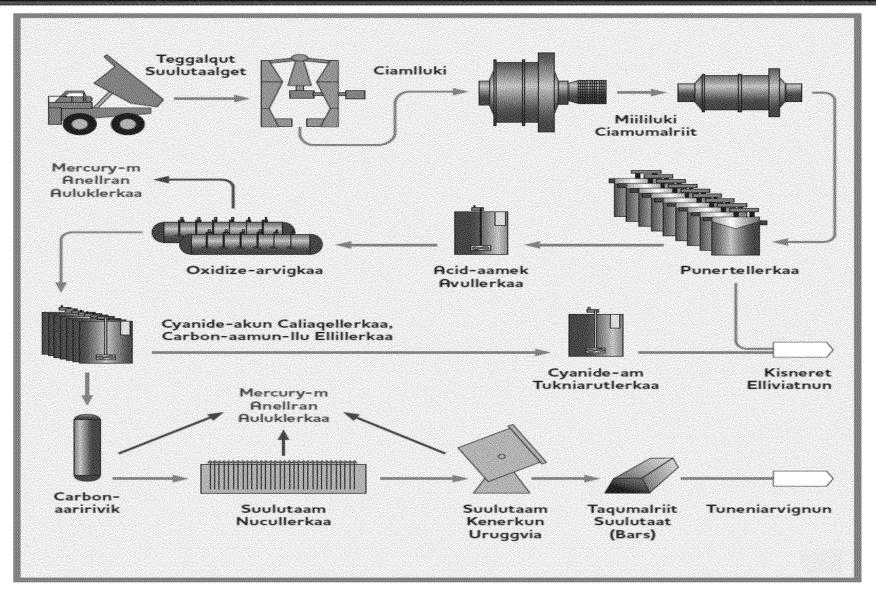
- Outreach
 - Ongoing village meetings
 - School visits
 - Site and mine tours
 - Bethel and Aniak offices
 - Yup'ik presentations
- Communications
 - Newsletter
 - Project Booklets
 - Social Media

Personal Privacy / Ex. 6

Personal Privacy / Ex. 6

Ayagturallra





Donlin Gold



- Photo Journey:
 - Donlin Gold project site to Kuskokwim Bay

















More Information



- Website and Project Video:
 - http://www.donlingold.com/our-plan
- Project Description Booklet:
 - http://www.donlingold.com/wordpress/wpcontent/uploads/2011/01/Donlin_PD_Book_2012 .pdf
- Army Corps' Donlin Gold ElS Website:
 - http://donlingoldeis.com/

Donlin Gold Meeting with Dennis McLerran, RA EPA Region 10 Thursday, May 21, 2015 Seattle EPA Office

Proposed Agenda

- 1. Introductions
 - a. Donlin Gold attendees: Stan Foo, General Mgr.

Nick Enos, Permitting Mgr. Patty McGrath, Consultant

- 2. Brief Project Summary
- 3. Permitting Status
 - a. Environmental Impact Statement Update
 - b. Major Permit Applications
- 4. Key EPA Involvement and Review
 - a. PDEIS Review In progress; Corps on track to release DEIS for public notice Q4 2015
 - b. 404 On track; will require close coordination between Corps and EPA
 - c. APDES On track; pre-application coordination with ADEC
 - d. PSD Air Quality On track; will require timely EPA approval of the "Adjust U*" option in AERMET/AERMOD
 - e. Mercury Management-On track
 - f. Financial Assurance In progress
 - g. Dam Safety On track; initial FMEA for TSF completed
 - h. Tribal Involvement On going
- 5. Communications next meeting and frequency for following up

Donlin Gold Meeting with Dennis McLerran, RA EPA Region 10 Thursday, May 21, 2015 Seattle EPA Office

Proposed Agenda

- 1. Introductions
 - a. Donlin Gold attendees: Stan Foo, General Mgr.

Nick Enos, Permitting Mgr. Patty McGrath, Consultant

- 2. Brief Project Summary
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 - f. Financial Assurance In progress
 - g. Dam Safety On track; initial FMEA for TSF completed
 - h. Tribal Involvement On going
- 5. Communications next meeting and frequency for following up

Organizer: Thiesing, Mary[Thiesing.Mary@epa.gov]

From: Thiesing, Mary

Location: R10Sea-Room-20Chinook/R10-Rooms-Service-Center

Importance: Normal

Subject: Discussion on Donlin 3a letter with R10

Start Time: Thur 5/26/2016 6:30:00 PM **End Time:** Thur 5/26/2016 7:30:00 PM

Required Attendees: Allnutt, David; Szerlog, Michael; Goodin, John; Kaiser, Russell; Landers, Timothy; Miller, Clay; LaCroix,

Matthew; Anderson-Carnahan, Linda

This call is at 2:30 eastern to discuss recommended changes to the letter.

Ex. 6
Conference ode Ex. 6

Organizer: Hladick, Christopher[hladick.christopher@epa.gov]

From: Hladick, Christopher

Location: RA's Office; MM Line Personal Privacy / Ex. 6 (no passcode)

Importance: Normal

Subject: Donlin Gold Mine Briefing for RA

 Start Time:
 Tue 1/23/2018 10:15:00 PM

 End Time:
 Tue 1/23/2018 11:00:00 PM

Required Attendees: Allnutt, David; Jen, Mark; LaCroix, Matthew

Optional Attendees: Pirzadeh, Michelle; Werntz, James; Szerlog, Michael; Nogi, Jill; Erikson, Linda; Tyson, Linda; Fordham, Tami

Donlin Gold Briefing Jan 2018.pptx

MM Line added for remote participants: Personal Privacy / Ex. 6 no passcode)

POC: Mark Jen

Crooked Creek Airstrip Exploration Camp

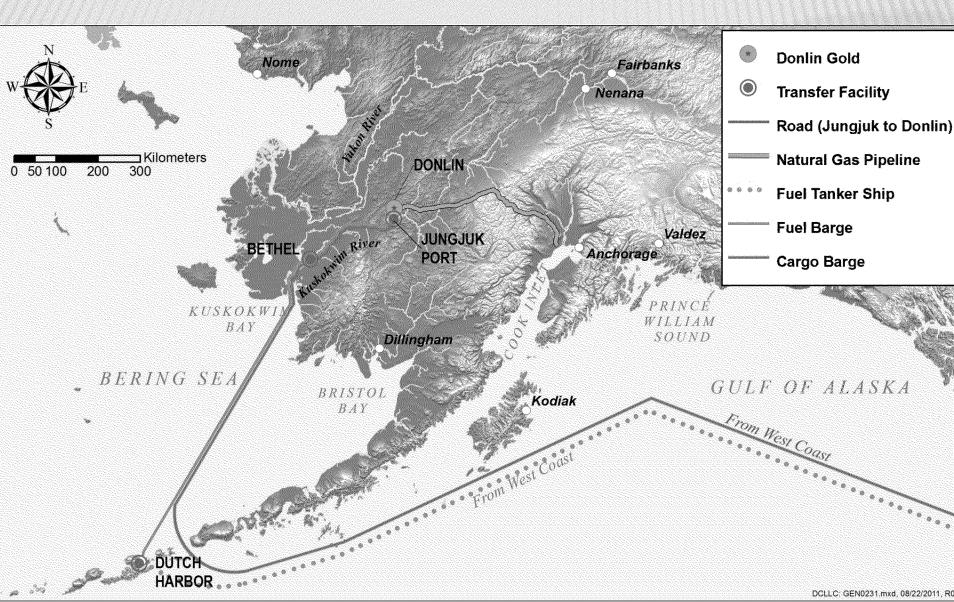
DONLIN GOLD PROJECT

January 2018

Tailings Storage Facility

PROPOSED PROJECT

■ MINE ■ TRANSPORTATION INFRASTRUCTURE ■ PIPELINE ■



STAKEHOLDERS

DONLIN GOLD LLC

LANDOWNERS

Mine Site (ANCSA)

- Calista Corp. (subsurface)
- Kuskokwim Corp. (surface)

Transportation Infrastructure

 Calista, Kuskokwim, State, City of Bethel

Natural Gas Pipeline Right-of-Way

- State of Alaska (66%)
- Federal BLM (31%)
- Calista Corp. & Cook Inlet (CIRI)

RESIDENTS (Y-K Region)

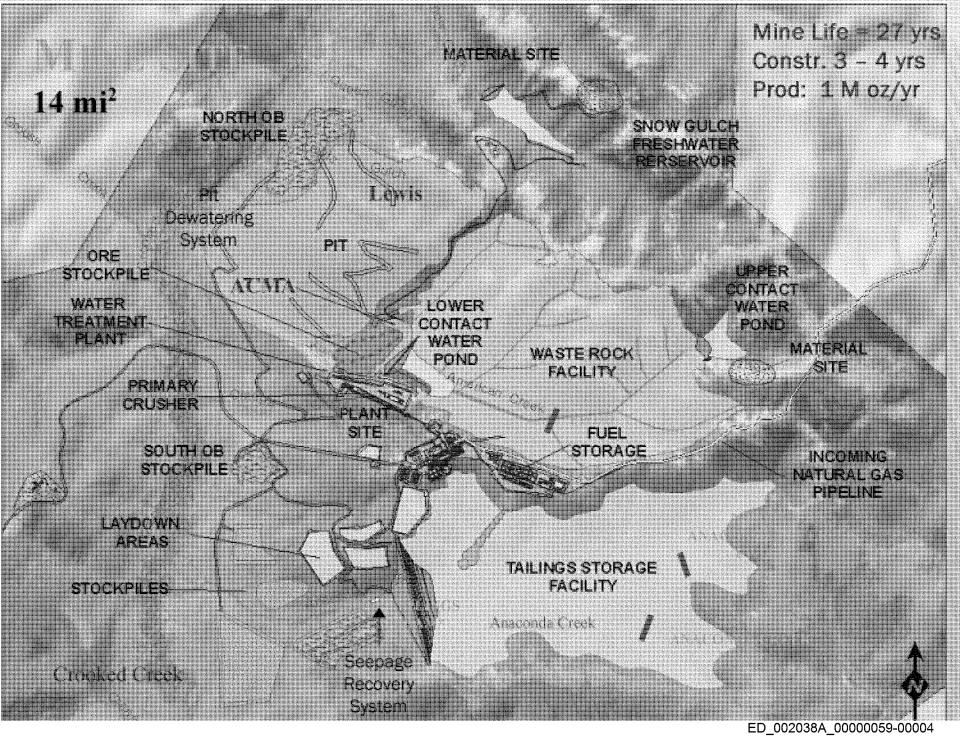
Alaska Tribes (66)

EIS DEVELOPMENT

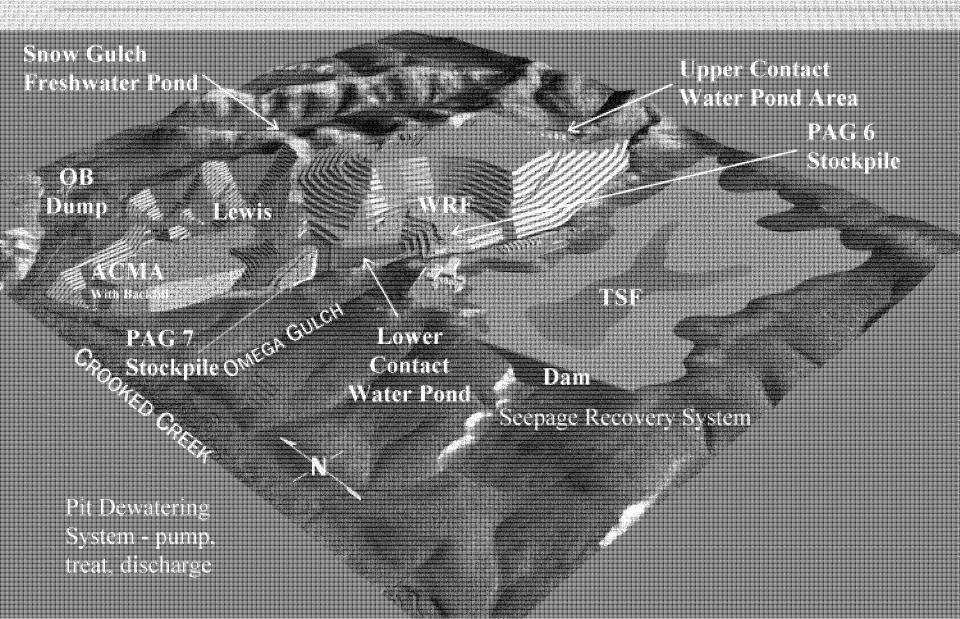
Corps of Engineers – Lead

Cooperating Agencies

- EPA, BLM, PHMSA, USFWS
- State ADNR, ADEC, ADFG
- Tribal Governments (5)



WATER MANAGEMENT



FOCUS OF EIS REVIEW

In May 2016, Region 10 commented on the draft EIS, providing an Environmental Objections (EO) rating. We continue to work with the Corps to reduce the impacts from this project. We started working early to share what's needed to protect:

- Surface and Ground Water Quality
- Human Health Subsistence Impacts
- Permafrost
- Wetlands/Aquatic Resource Impacts

CWA 404(B)(1) GUIDELINES COMPLIANCE

- The 2016 DEIS contained
 - Acreage values for aquatic resource impacts that the Alaska District Corps of Engineers considered inaccurate
 - Information on aquatic resource function and impact significance that the District planned to remove in the FEIS
 - No analysis of compensatory mitigation for impacted aquatic resources
- The DEIS did not evaluate compliance with the 404(b)(1) Guidelines, although the District requested that Donlin prepare this analysis in 2012

CWA 404(q) DISPUTE RESOLUTION

- In 2016, the Corps issued the CWA § 404 Public Notice concurrent with the DEIS
 - Pursuant to the CWA § 404(q) MOA, EPA submitted a 3(a) letter on May 31, 2016 and 3(b) letter on June 27, 2016
- In December 2017, Donlin submitted a revised § 404 permit application to the Corps, including accurate estimates of wetlands acreage/impacts
- The Corps plans to issue a revised Public Notice concurrent with the FEIS
- We will review the revised permit application, together with the FEIS (expected spring 2018), to determine whether issues raised in 3(b) letter have been resolved

CWA 404/COMPENSATORY MITIGATION

- Donlin's revised CWA § 404 application includes a compensatory mitigation plan
- Unavoidable Permanent Impacts
 - 2,053 acres of wetlands and 156,755 linear feet (29.7 mi)
 of streams
- No compensation proposed for 1,753 acres of life-of-mine "temporary" impacts
- Alaska District Credit/Debit Method not used no functional assessment included
- Permittee Responsible Mitigation proposed
 - Restoration in Upper Crooked Creek watershed
 - Preservation in Chuitna Creek watershed

FINANCIAL CONSIDERATIONS

MINE SITE/TRANSPORTATION INFRASTRUCTURE		
Reclamation & Closure		\$259 M
Long-Term Post Closure/Water Quality (Trust Fund)		\$73 M
PIPELINE		
Removal, Abandonment, Reclamation		\$10 M
	TOTAL:	\$342 M

State of Alaska & BLM

- Manage/Implement Financial Assurance Instrument
- Letter of Credit and/or Surety Bond

NEPA COOPERATING AGENCY ENGAGEMENT

- On-going meetings with the Corps & Donlin
- Reviewed the Preliminary Final EIS comments sent September 2017
- Technical Issues Meeting to discuss those comments scheduled for February 1, 2018
- FEIS Anticipated Spring 2018 we will review and provide final comment letter

Organizer: McLerran, Dennis[mclerran.dennis@epa.gov] McLerran, Dennis From: Ex. 6 Location: ET Conf Room + Conf line: code: Ex. 6 Importance: Normal Subject: RA Pre-Briefing: Meeting with Stan Foo/Donlin Gold Start Time: Mon 5/18/2015 10:15:00 PM End Time: Mon 5/18/2015 11:00:00 PM Required Attendees: Allnutt, David; Reichgott, Christine; Jen, Mark; Soderlund, Dianne; Marcy, Ken; Szerlog, Michael; Dunbar, Bill **Optional Attendees:** Islam, Mahbubul; Wong, Herman; Godsey, Cindi; LaCroix, Matthew Donlin Gold RA Briefing 5-18-2015.pdf Donlin Gold Project EIS - RA briefing for upcoming meeting with Stan Foo, General Meeting Subject(s)/Title of the Meeting or Event: Manager of Donlin Gold, LLC Program Office POC(s): ETPA - David Allnutt, Christine Reichgott, Mark Jen Priority: (High, Medium, Low) High Purpose of the meeting Informational prep briefing on the Donlin Gold Project EIS (informational, decisional, prep) Brief background information: The Donlin Gold Project is a proposed open pit gold mine in southwest Alaska within the middle Kuskokwim River region. The remoteness of the mine requires development of major transportation infrastructure and a natural gas pipeline. The region is home to 66 tribal villages who rely on subsistence hunting and fishing as their way of life. The land is owned by several ANCSA native corporations who has an agreement with Donlin Gold, LLC. - project proponent. The U.S. Army Corps of Engineers is the lead for the EIS and the EPA is a cooperating agency. Location and/or suggested travel RA's office with teleconference or Lync or adobe connection to AOO plan if offsite: When would you like to have this Mid-May, but should occur prior to the meeting with Donlin Gold, LLC. meeting? Please indicate if there are deadlines. How long should the meeting last? 45 minutes (Typically, briefings last no more than 45 minutes)

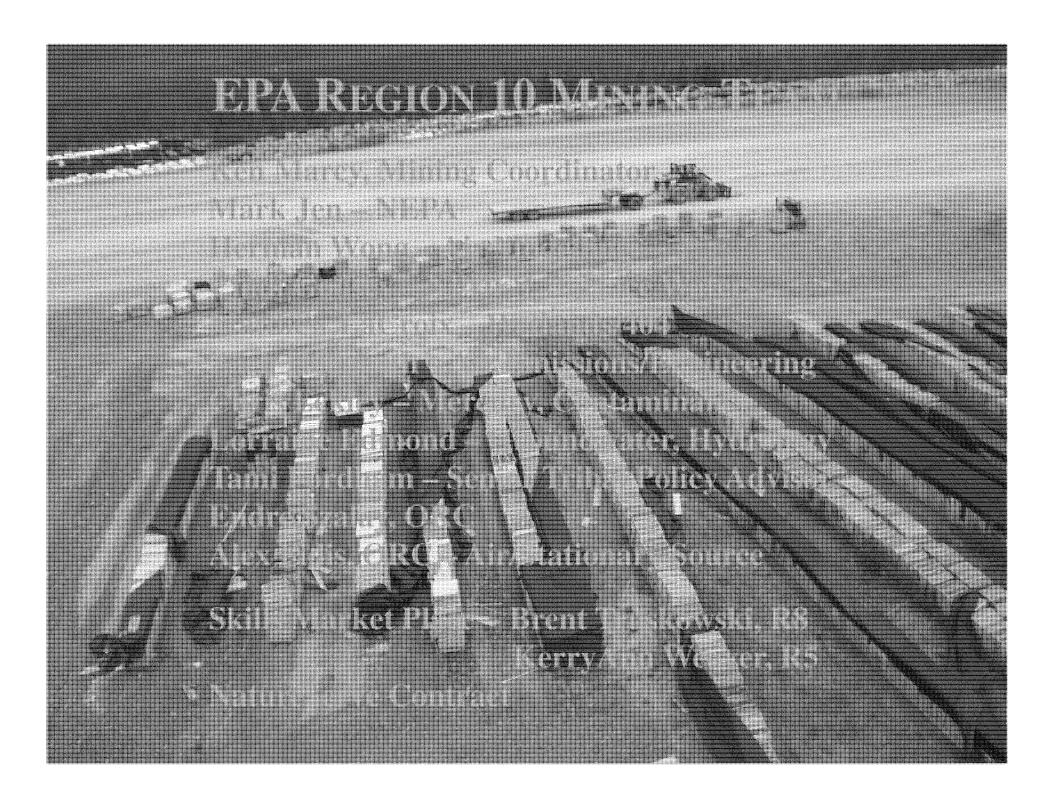
Required attendees:

David Allnutt, Dianne Soderlund, Teena Reichgott, Michael Szerlog, Ken Marcy, Mark Jen

IT/AV Equipment Needed (laptop, VTC, mics, etc)

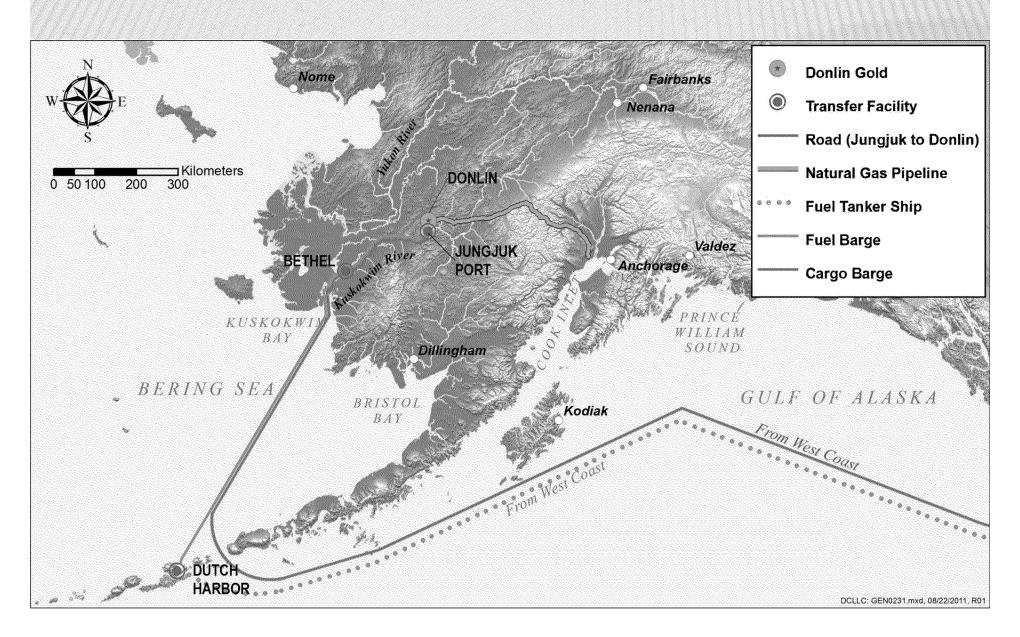
Telephone, laptop





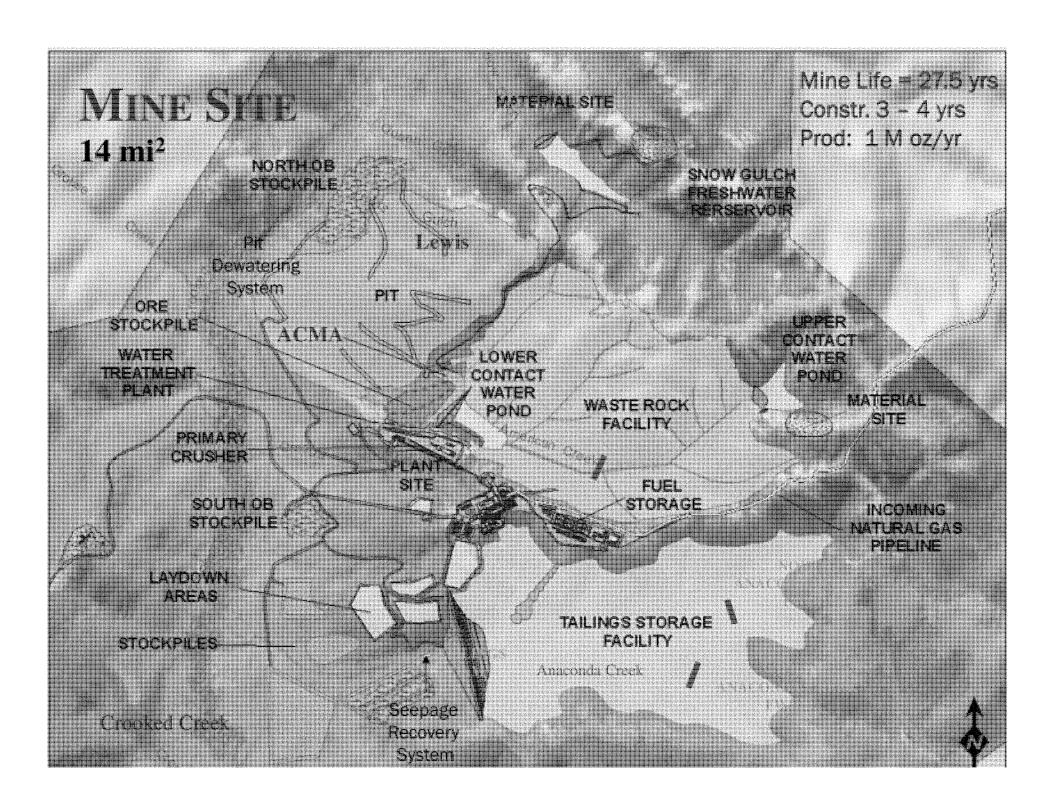
PROJECT COMPONENTS

Mine Transportation Infrastructure Pipeline



STAKEHOLDERS

DONEIN GOLD LIT RESIDENTS (Y-K Region) State of Alaska (66%) Federal – BLM (31%) Calista Corp. and Cook Inle



NEPA & PSD AIR QUALITY ANALYSIS

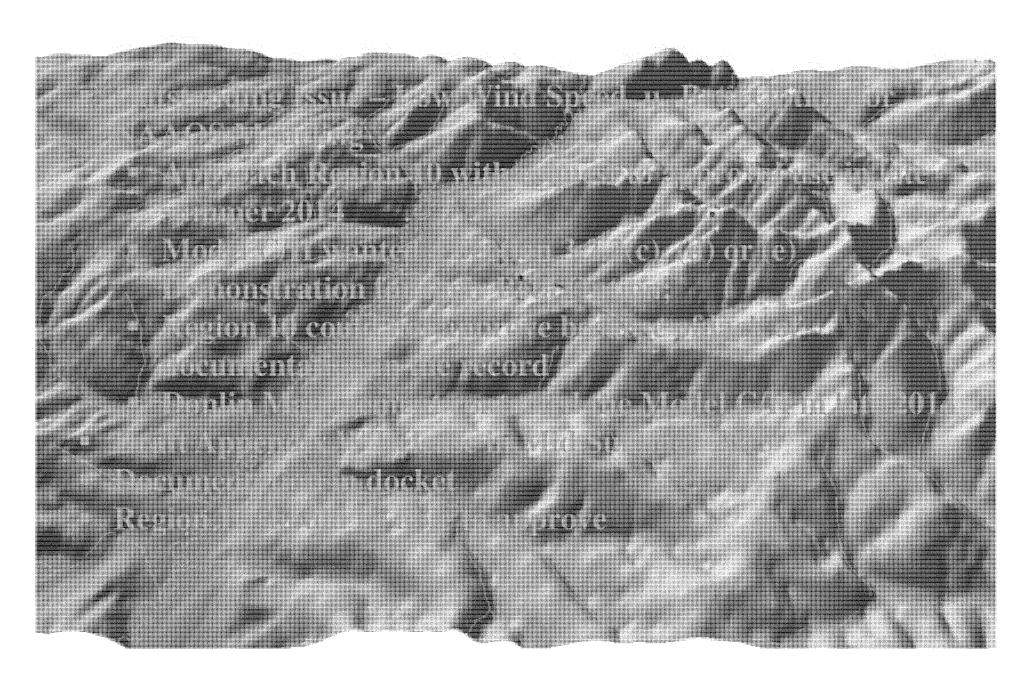
Team:

- Region 10 (NEPA)
 - Herman Wong, OEA, Meteorology and Dispersion Modeling
 - Zach Hedgpeth, OEA, Emissions and Engineering
 - Alex Fidis, ORC, Stationary Source Determination
- State of AK (PSD Permit)
 - Alan Schuler, Dispersion Modeler
 - James Renovatio, Emissions and Engineering
 - Barbara Trost, Meteorology
- Donlin
 - Nick Enos, Permit Lead
 - Air Sciences, Contractor

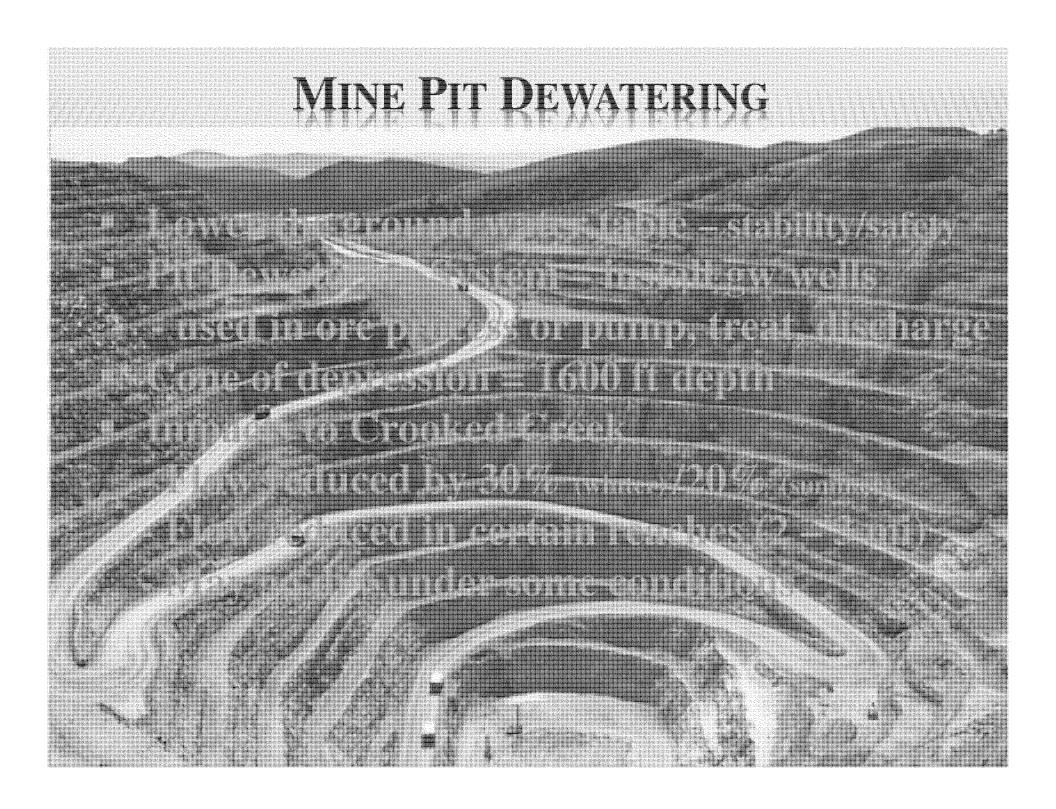
NEPA & PSD AIR QUALITY ANALYSIS

- Region 10 coordinate with NPS and FWS
- Meetings in Anchorage and Seattle
 - Region 10, AK and Donlin Team in Attendance
 - Agree that NEPA and PSD Permit Analyses should be similar
 - Identify, discuss and resolve issues related to PSD Permit
 - Resolve issues consistent with laws, regulations and science
- Over 10 issues were resolved since 2006, some requiring Region 10 approval

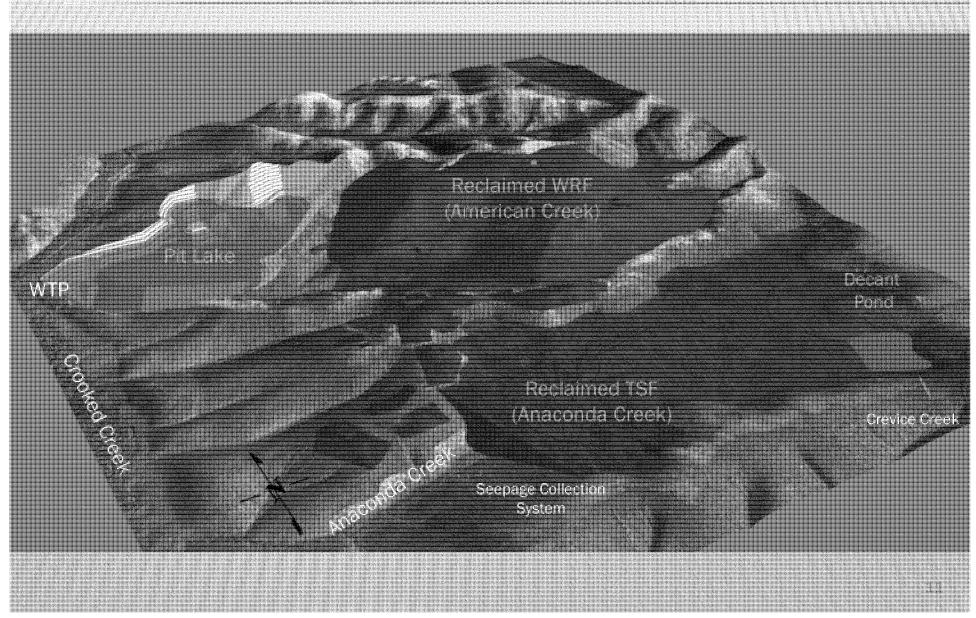
NEPA & PSD AIR QUALITY ANALYSIS

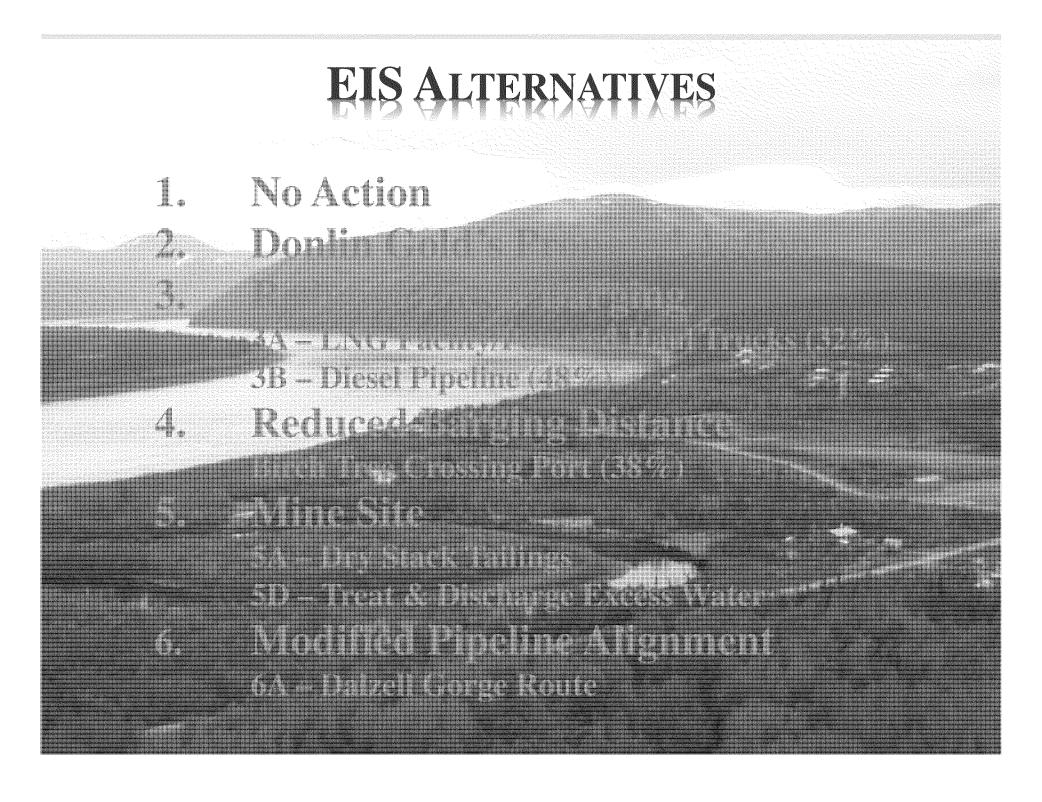


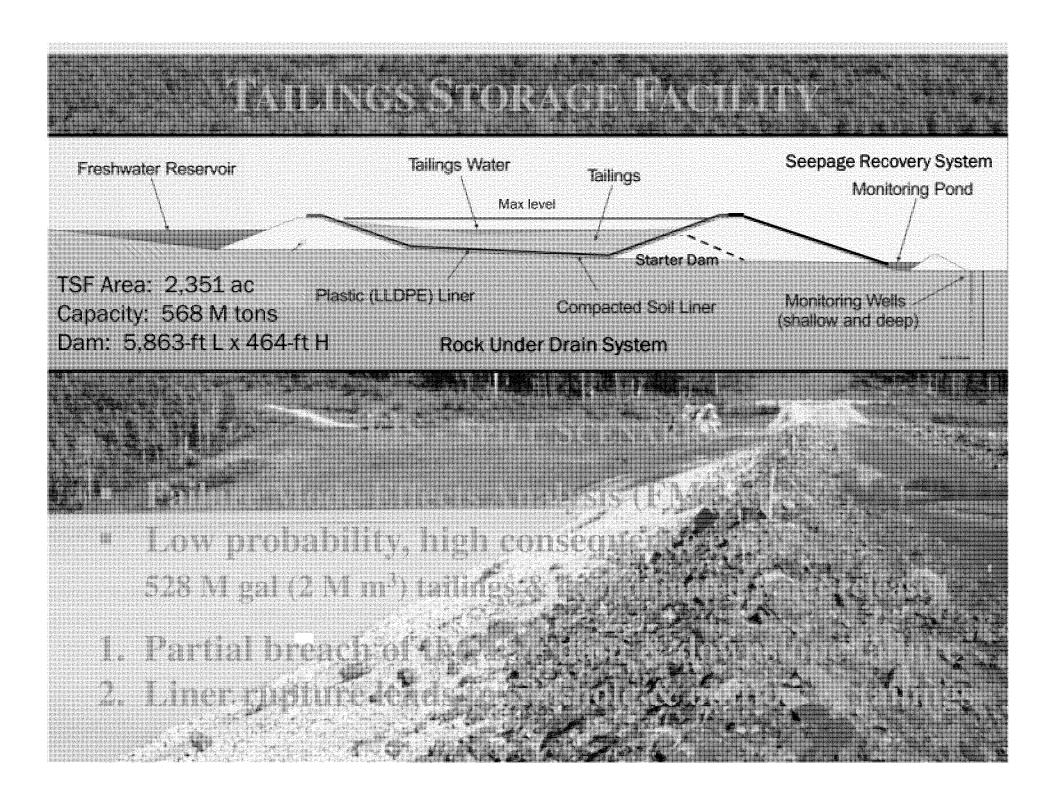
WATER MANAGEMENT Witer Poni Recovery Cystem



RECLAMATION & CLOSURE Long-Term Water Monitoring







CHEMICAL MANAGEMENT Mercury, Cyanide, Tailings, Diesel, Natural Gas, LNG

ACID ROCK DRAINAGE

Categories	Description	Tons	%	Management
NAG	Unlikely to generate ARD	2.8 B	93	WRF
PAG 5	Several decades to onset of ARD	87 M	3	Blended with NAG in WRF
PAG 6	Less than a decade to onset of ARD	135 M	4	Minimize contact with water; Place in isolated cells in WRF Pit backfill at closure*
PAG 7	Less than a few years to onset of ARD	2.6 M	<0.1	Low grade ore stockpile Pit backfill at closure*
	Total	3.0 B		

^{*}At closure, the Open Pit will be the Pit Lake, which will submerge the waste rock.

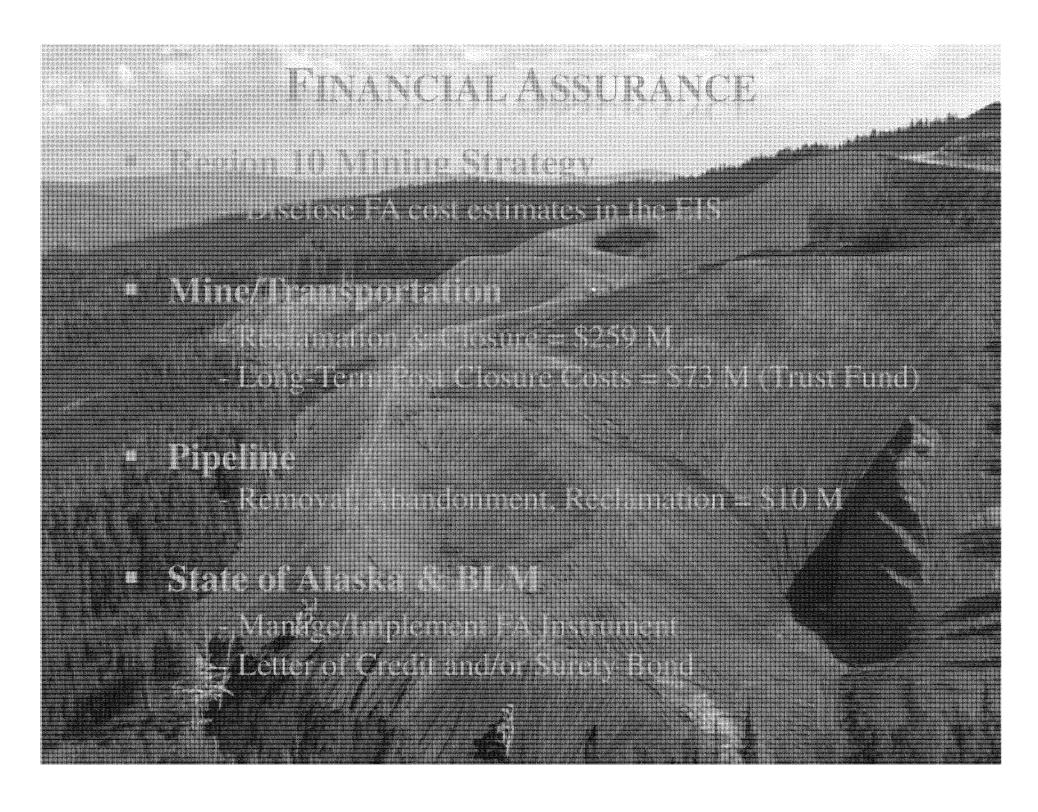


WETLANDS COMPENSATORY MITIGATION

- Total scale of impacts is unprecedented, but presuming no significant degradation.
- Most of American and Anaconda creeks would be eliminated, potentially significant impacts to Crooked Creek flow.

Project	Wetland Impa Constru	River/Stream (miles)	
Components	Direct	Indirect	
Mine	5,489 (61%)	1,432	42
Infrastructure	195 (23%)	1,014	2
Pipeline	2,072 (36%)	NA	29
Total:	7,756 (48%)	2,446 (15%)	73

- Wetland Functional Assessment will be used to calculate debits and credits. A 2:1 mitigation ratio applied to the direct impacts would be over 15,000 debits, would require 20,000 acres to offset. Scale of compensation equivalent to project.
- Calista Corporation proposed a mitigation bank that would preserve 20,000 acres. The
 District did not accept their initial proposal.
- Compensation workshop summer 2015. Mitigation Plan won't be developed until after FEIS issued. Compensation options should be analyzed in EIS.

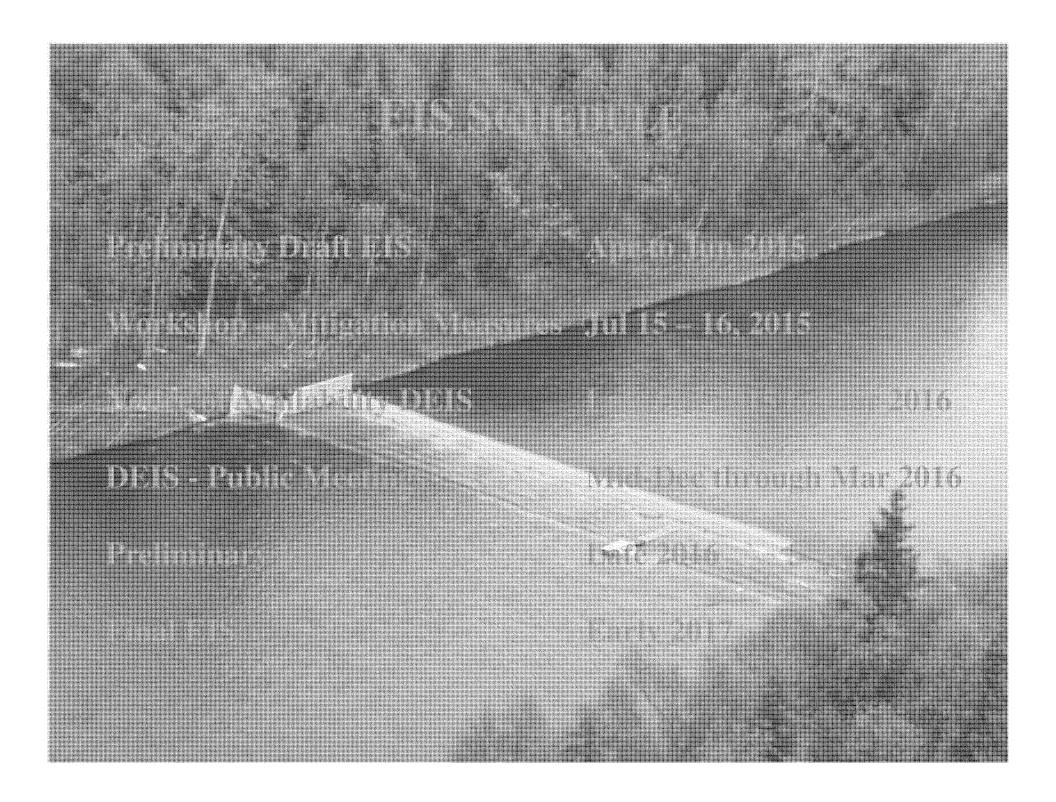


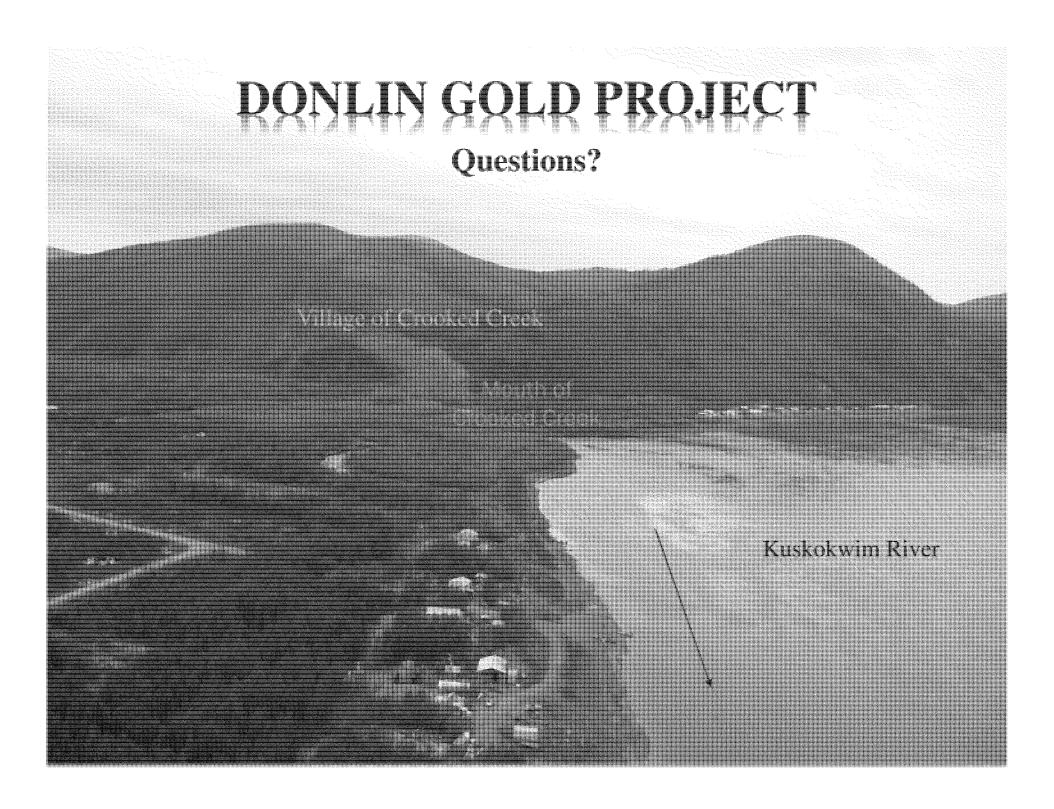
FINANCIAL ASSURANCE

Alaska Mines

Operation	F.A. Mechanism	Total Bond (\$ Millions)
Greens Creek Mine	Surety Bond USFS	\$30.5 Currently being updated
Red Dog Mine	Letter of Credit	\$305.2
Fort Knox Mine	Letter of Credit	\$65.8 Currently being updated
True North Mine	Letter of Credit	\$3.1
Kensington Project	Surety Bond USFS	\$28.7
Rock Creek Mine	Letter of Credit	\$13.5
Pogo Mine and Road	Letter of Credit	\$57.1
Nixon Fork Mine	Surety Bond BLM	\$6.0
Niblack Project	Letter of Credit	\$1.2

Source: Presentation by SOA: Alaska Mine Permitting Process Financial Assurance (January 29, 2014).





From: Allnutt, David

Location: Kenakatnu board room

Importance: Normal

Subject: Donlin EIS presentation

Categories: Orange Category

 Start Time:
 Thur 2/12/2015 6:00:00 PM

 End Time:
 Thur 2/12/2015 7:15:00 PM

Organizer: Hladick, Christopher[hladick.christopher@epa.gov]

From: Erikson, Linda
Location: RA's Office
Importance: Normal

 Subject:
 NEPA 101 Briefing for RA

 Start Time:
 Wed 1/3/2018 11:00:00 PM

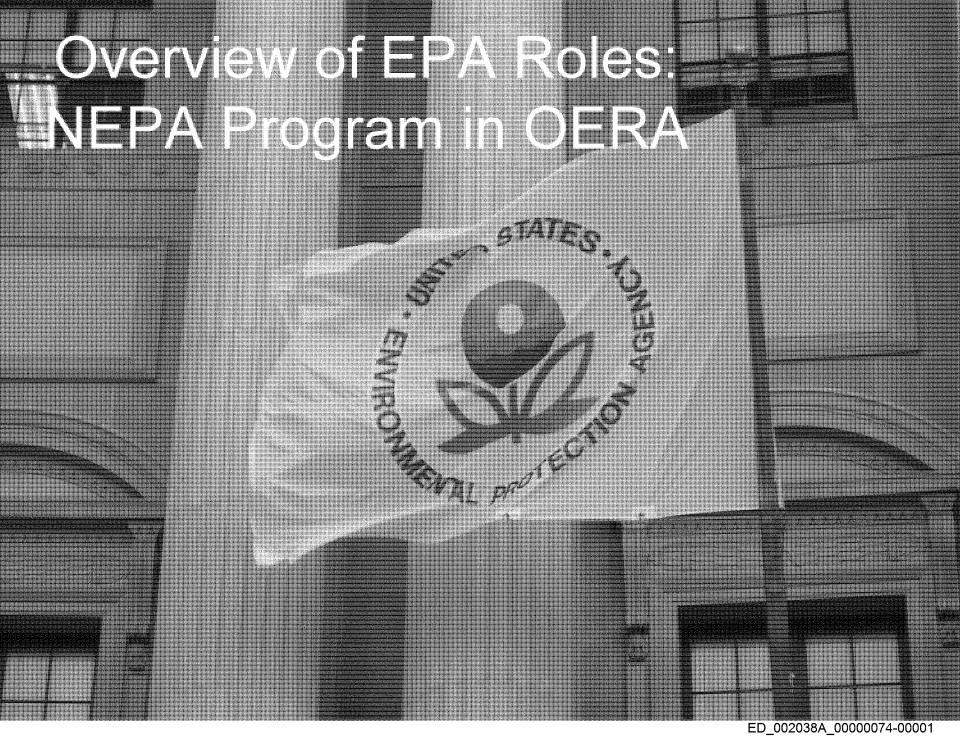
 End Time:
 Wed 1/3/2018 11:45:00 PM

Required Attendees: Allnutt, David; Nogi, Jill; Anderson-Carnahan, Linda

Optional Attendees: Pirzadeh, Michelle

010218 EPA Roles on NEPA for RA Chris Hladick.pptx

Please forward to any additional staff you would like to participate in this briefing. Any briefing materials should be submitted to R10-ORA@epa.gov 3 days prior to the briefing. For scheduling issues, please contact us at x31234.



National Environmental Policy Act

- The White House Council on Environmental Quality, in the Executive Office of the President, oversees NEPA implementation/compliance
- Congress enacted NEPA in 1969; signed into law in 1970
- CEQ adopted NEPA regulations in 1978, establishing minimum federal requirements
 - Consistent with CEQ regulations, federal agencies developed their own individual NEPA compliance regulations in the late 70s/early 80s



National Environmental Policy Act

Requires federal agencies to:

- Evaluate the environmental impacts from the major federal actions they plan to conduct, early in the process
- Disclose the project information and anticipated impacts to the public, as well as mitigation measures taken to reduce those impacts
- Factor the results of the impact evaluations into their respective decision-making processes
 - If the Agency determines that the effects of a major federal action may be significant, NEPA requires the preparation of an environmental impact statement (EIS)



NEPA as an Umbrella Law

- Economic, social, and environmental effects
- Public involvement, interagency coordination
- Tribal consultation
- Wild and Scenic Rivers Act
- Endangered Species Act
- Clean Water Act/Floodplains
- Clean Air Act
- Safe Water Drinking Act
- Farmland Protection Policy Act
- National Historic Preservation Act



Three Types of NEPA Documentation

- Categorical Exclusion: Category of actions which individually or cumulatively do not have a significant effect on the human environment: Prepared for ~95% of federal actions nationwide
- Environmental Assessment: Concise public document providing sufficient evidence or analysis to support either a Finding of No Significant Impact (FONSI) or the need to further prepare an EIS: Prepared for < 5% of federal actions nationwide
- Environmental Impact Statement (EIS): Detailed statement for major federal actions with potentially significant impacts: Prepared for < 1% of actions nationwide



EPA Has Multiple Roles in the NEPA Process

- EPA complies with NEPA, as necessary, for EPA-led actions
- EPA *reviews* NEPA documents developed by other federal agencies, pursuant to NEPA and Section 309 of the Clean Air Act
- EPA serves as a *Cooperating Agency* for the development of EISs on important projects (as invited and resources allow)



NEPA Compliance Activities at EPA

- EPA complies with NEPA for a limited number of its own actions, including:
 - Certain research and development activities
 - Construction at EPA Facilities
 - EPA-issued Clean Water Act National Pollutant Discharge Elimination System permits for new sources
 - Projects funded through special appropriations acts
- In Region 10, the lead for NEPA compliance is in the OWW/NPDES Permits Unit



NEPA Compliance Activities at EPA

- EPA is statutorily exempt from complying with NEPA for all CAA and almost all CWA activities
- A wide range of other EPA actions are exempted as being "functionally equivalent" to NEPA
 - Actions under CERCLA, RCRA, FIFRA, MPRSA, TSCA and SDWA are considered functionally equivalent
- •Region 10 works on a few NEPA compliance EISs every so often. Currently involved with two NEPA compliance actions (Liberty, Klickitat Hatchery)

Environmental Impact Statements

- Draft EISs evaluate the impacts of the action and analyze a range of reasonable alternatives that accomplish the project purpose and need, in order to help determine the environmentally preferable alternative for the project
- Final EISs respond to comments on the draft EIS, reflect any project changes, and provide additional information regarding project impacts
- Supplemental EISs are required if:
 - the lead agency makes substantial changes to the proposed action; or
 - there are significant new circumstances/information relevant to environmental
 concerns

NEPA Review: Section 309 of the Clean Air Act

• CAA Section 309 requires the EPA to *review and comment in writing* on (1) legislation proposed by a federal agency, (2) major federal agency actions, and (3) proposed regulations https://ceq.doe.gov/laws-regulations/laws.html

- Region 10 reviews draft EISs, and comments in writing that is made available to the public on EPA's website
 - We rate draft EISs using a standard NEPA ratings system that determines the project's potential for environmental impacts and the adequacy of the impacts analysis presented

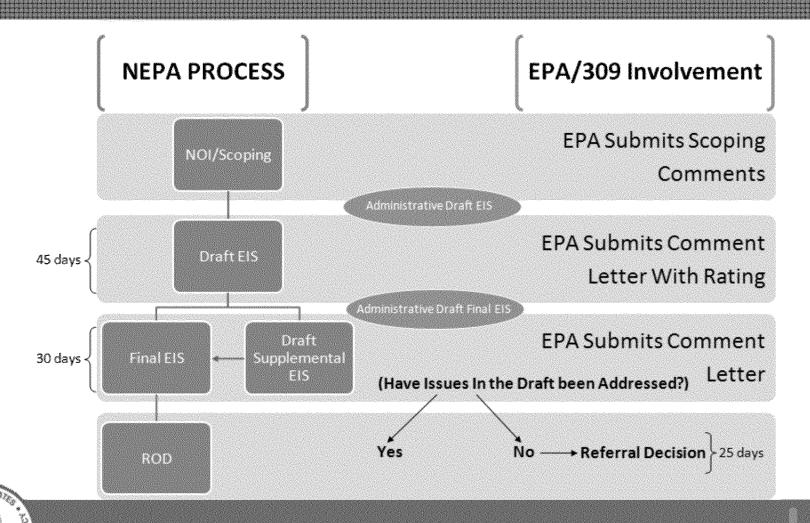


NEPA Review: Section 309 of the Clean Air Act

- "Significance" as used in NEPA requires considerations of both context and intensity, when evaluating the significance of the action and the severity of the impacts
- CAA Section 309 states that if EPA "determines that any such legislation, action, or regulation is unsatisfactory from the standpoint of public health or welfare or environmental quality, he shall publish his determination and the matter shall be referred to the Council on Environmental Quality"

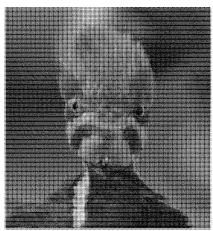


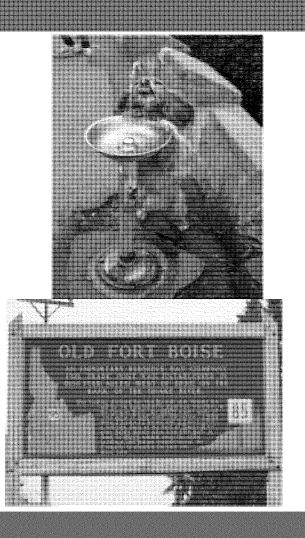
EPA's Role In The NEPA Process



Some Resources Analyzed Under NEPA









EPA's Review Approach

Utilize expertise at EPA to:

- Collaborate with agencies, in advance of EIS publication, to address environmental issues as early as possible
 - -As resources allow, serve as a cooperating agency
- Prepare scoping comments near the beginning of the EIS process to provide the lead agency with environmental information and analysis tools
- Provide quality comments and recommended remedies to strengthen NEPA analyses and lessen environmental impacts
- EPA does not "approve" or "deny" projects



EPA as a Cooperating Agency

Consultation among multiple agencies before an EIS is prepared to help develop it in a way that reduces the need for formal adverse comments:

- Provides early regional expertise as part of "scoping" process
- Provides input on potential impacts, reasonable alternatives, and practicable mitigation for issues and leverages technical expertise from relevant EPA programs
- Region 10 cooperated on 11 projects in FY17



EPA's EIS Rating System

Substantive impacts:

LO = Lack of Objections

EC = Environmental Concerns

EO = Environmental Objections

EU = Environmentally Unsatisfactory

Quality of analysis:

1 = Adequate

2 = Insufficient Information

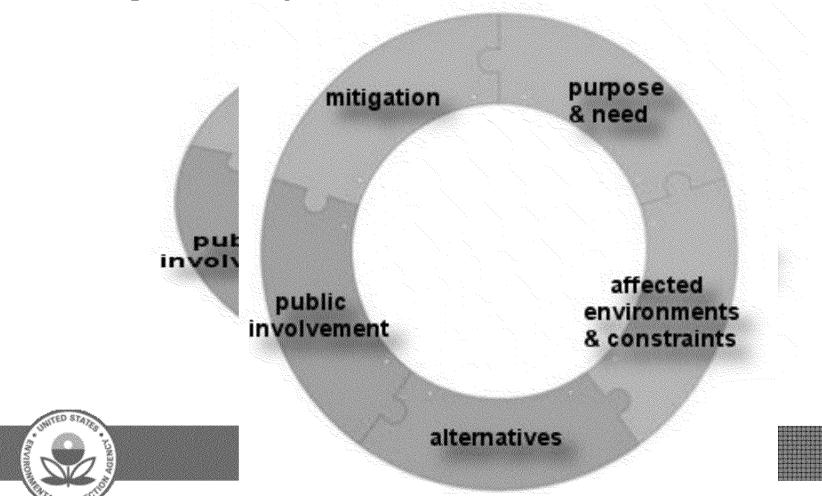
3 = Inadequate

In the rare instances where EPA issues an EU or 3 rating, HQ concurrence is required at the AA level, signature is at the RA level, and the proposed action may be a candidate for referral to CEQ. Region 10 has not referred a project to CEQ since at least 2004, and likely longer.

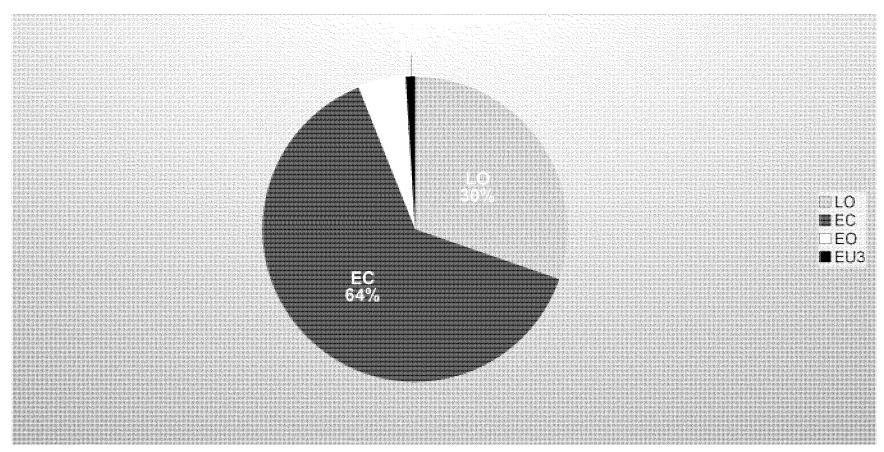


EIS – NEPA Wheel

How the pieces fit together:



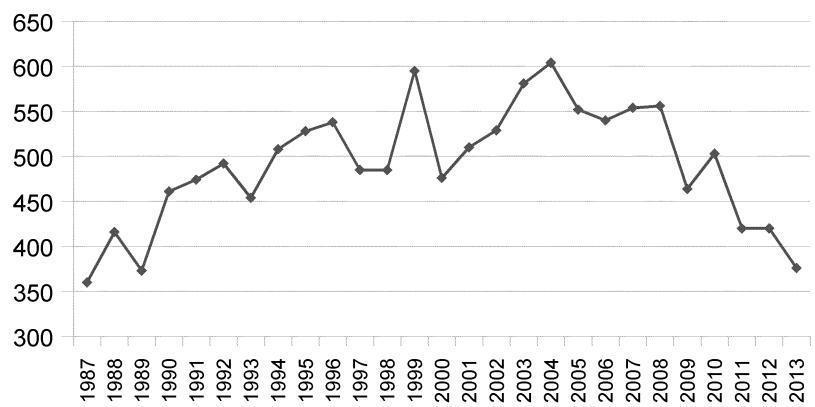
EPA's DEIS Ratings between 2005 - 2016





EISs Filed Nationwide between 1987 – 2013

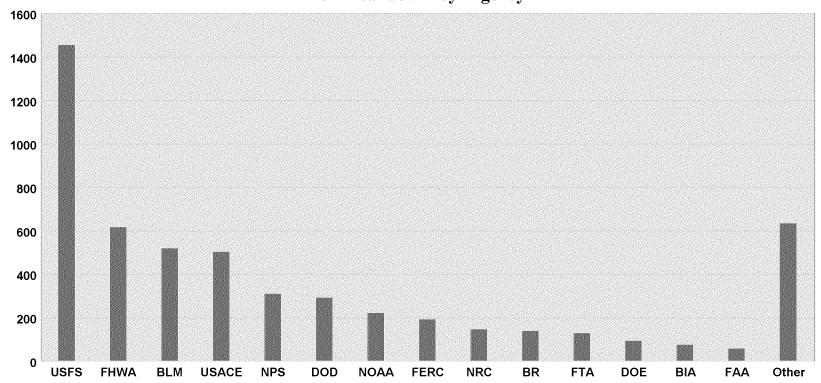
EISs Filed





EISs Filed by Agency between 2005 – 2016

EIS Breakdown by Agency





Region 10 NEPA Resources and Workload

- R10 receives 10.2 FTE from the national program (FY2017)
 - 5.5 FTE committed to NEPA review in ERSMU, with the remainder funding associate reviewers, management, and overhead
- Region 10 reviews and comments on approximately 100 NEPA documents/year
 - Scoping, EAs, EISs (draft and final)
- Large federal land base in Region 10 means that a great variety of large projects here require a federal authorization of some kind
- Tend to have big projects in the oil and gas, energy, forestry, mining sectors.
 - Region 10 typically serves as a cooperating agency on 11-12 projects/year



High Priority Infrastructure Initiatives

- Presidential Initiative to streamline infrastructure environmental reviews and permitting:
 - **EO13807 August 15, 2017** Establishing Discipline and Accountability in the Environmental Review and Permitting Process for Infrastructure
- FAST-41: Covered Projects Determined by DC, Permitting Dashboard, Permitting Timeline, SOPs in development with HQ, Regional Coordination with lead agency and HQ.... Determining what's on the Dashboard, will EPA Cooperate or Not



Current Elevation Criteria for Coordinating with EPA HO

- A proposal to provide an adverse rating (which indicates a potential referral to CEQ) within an EPA comment letter on a DEIS
- A letter on a FEIS that characterizes a residual serious concern and/or proposes or implies that a supplemental analysis might be required
- A comment letter on a DEIS or FEIS that would cause regional controversy, significant media attention, or congressional/state concerns
- A comment at any stage of the EIS process that establishes policy or a precedent



Other Environmental Review Roles

- The State of Washington's State Environmental Policy Act (SEPA) establishes "NEPA-like" requirements
 - EPA receives notice of many projects undergoing analysis under SEPA
 - We sometimes comment in coordination with the WA Department of Ecology
 - If Ecology requests our review of a SEPA document or asks for technical assistance, we take it under consideration with management, and participate when resources and policies allow
- International Environmental Assessment/Training
 - The Office of Federal Activities runs this program and sometimes uses trained regional staff to deliver training in other countries
 - We have participated where we can, when requested, in some Canadian project reviews

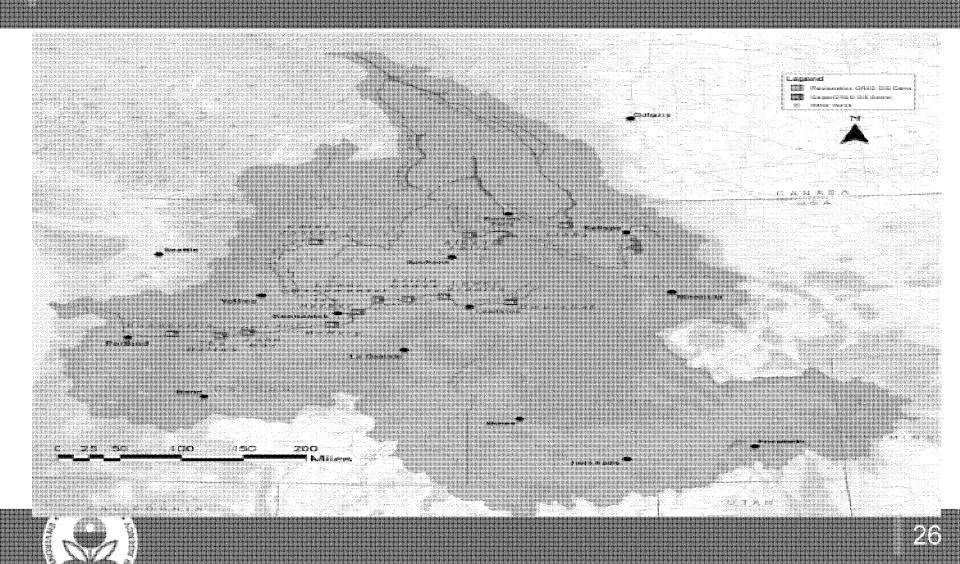


Hot Issues/Projects for the R10 NEPA Program

- Scope of Analysis
- Columbia River Dam System Operations/temperature/salmonids
- Coal exports/Energy projects Millennium Bulk Terminals
- Major infrastructure and FAST-41 (AK LNG, Jordan Cove LNG pipelines)
- Pebble and Donlin Gold Mines in AK; Stibnite Mine in ID

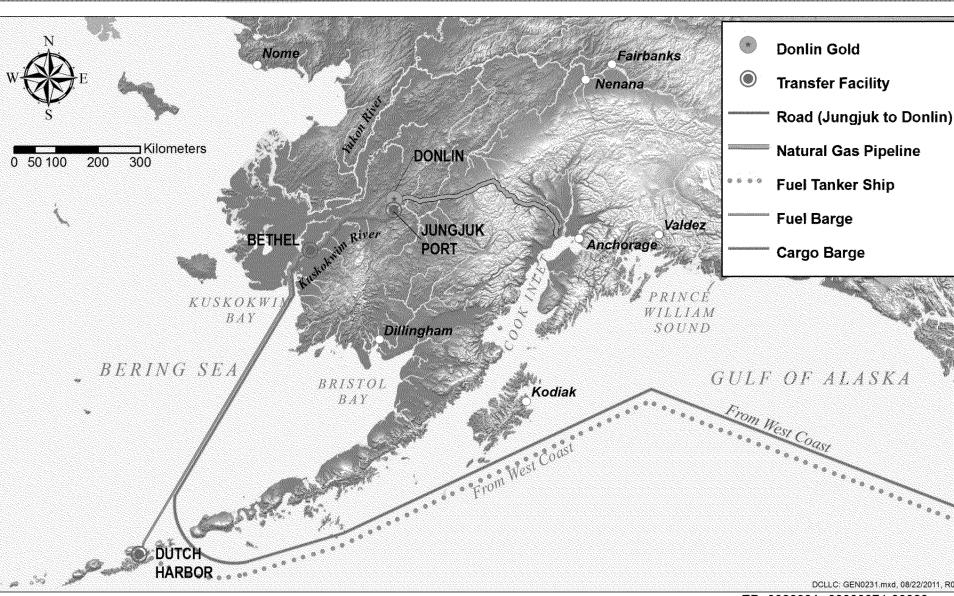


Columbia River System Operations EIS





Proposed Donlin Mine, Transportation, Pipeline



Organizer: Tyson, Linda[Tyson.Linda@epa.gov]

From: Tyson, Linda

Location: R10-ORA@epa.gov

Importance: Normal

Subject: Reminder: Donlin Mine materials due by COB for 1/22 briefing

 Start Time:
 Wed 1/17/2018 11:30:00 PM

 End Time:
 Thur 1/18/2018 12:00:00 AM

Organizer:	Jen, Mark[Jen.Mark@epa.gov]		
From:	Jen, Mark		
Location:	David's Office and teleconference for remote participants		
Importance:	Normal		
Subject:	Donlin Gold Project DEIS - Management Briefing on Issues and Rating (REVISED TIME)		
Start Time:	Thur 4/7/2016 11:00:00 PM		
End Time:	Fri 4/8/2016 12:00:00 AM		
Required Attendees:	R10AOO-CfLn Ex. 6 Allnutt, David; Soderlund, Dianne; Littleton, Christine; Szerlog Michael; Thomas, Sally; Godsey, Cindi; LaCroix, Matthew; Eckley, Chris; Grass, Running		
Optional Attendees:	Thiesing, Mary; Owens, Kim		
Greetings Everyone,			
Sorry for the last minut time 3:00 pm Alaska (4	e, but there was a management conflict with the earlier time slot, so I am sending out this revised meeting :00 pm Seattle) time.		
Same teleconference li	ne: Ex. 6 code: Ex. 6		
I hope this works for ev	veryone!		
Thanks for being flexibl	le.		

Mark

From: Allnutt, David

Importance: Normal

Subject: Review Donlin letter

 Start Time:
 Thur 5/17/2018 7:00:00 PM

 End Time:
 Thur 5/17/2018 8:00:00 PM

Organizer: R10-OERA Calendar[R10-OERA_Calendar@epa.gov]

From: R10-OERA Calendar

Location: R10Sea-Room-14Elwha/R10-Rooms-Service-Center: MeetMe LIne: Ex. 6

Importance: Normal

Subject: Briefing Re: Donlin FEIS and PN
Start Time: Thur 5/10/2018 10:00:00 PM
End Time: Thur 5/10/2018 10:45:00 PM

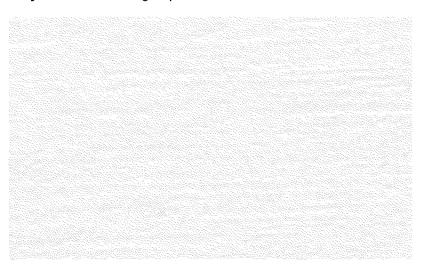
Required Attendees: Allnutt, David; Anderson-Carnahan, Linda; Nogi, Jill; Mendelman, Krista; Palomaki, Ashley; Thiesing, Mary;

LaCroix, Matthew; R10Sea-ConfLine Ex. 6; Jen, Mark

Optional Attendees: Steiner-Riley, Cara; Stern, Allyn

To: Allnutt, David[Allnutt.David@epa.gov]
From: Anderson-Carnahan, Linda
Sent: Thur 5/3/2018 3:05:22 PM

Subject: FW: Meeting request for RA on Donlin



Linda Anderson-Carnahan
Associate Director
Office of Environmental Review and Assessment
US EPA Region 10
Suite 155
1200 Sixth Ave
Seattle Wa, 98101
Office: (206) 553-2601

Office: (206) 553-2601 Cell: (206) 291-6879

From: Thiesing, Mary

Sent: Thursday, May 3, 2018 8:04 AM

To: Mendelman, Krista < Mendelman. Krista@epa.gov>

Cc: Anderson-Carnahan, Linda < Anderson-Carnahan. Linda@epa.gov>

Subject: RE: Meeting request for RA on Donlin

Hi Krista,

Just confirming— Personal Privacy / Ex. 6 Ind will be in Seattle working on Monday am.

From: Mendelman, Krista

Sent: Thursday, May 03, 2018 7:44 AM

To: Thiesing, Mary < Thiesing. Mary@epa.gov > Subject: RE: Meeting request for RA on Donlin

Good Morning, Mary.

Roger that. I will cc you on the message to David so you can add and correct as needed.

Krista

Krista Mendelman US EPA Region 10 MS:OWW-193 1200 6th Ave. Suite 900 Seattle WA 98101 206-553-1571 From: Thiesing, Mary

Sent: Thursday, May 03, 2018 6:30 AM

To: Mendelman, Krista < Mendelman. Krista@epa.gov>

Subject: RE: Meeting request for RA on Donlin

Krista.

Matt's not going to have time to look at this earlier than tomorrow. What I would ask is that you run the draft by David, and if he is OK with it, then we go ahead and submit it to Linda Erickson and see if we can get on Chris's schedule. If not, we can try and brief Michelle. I just didn't want to go out with comments without letting them know about it—even though we have already sent the 404q letters, it is still going to be controversial and they need to be ready for that. Matt and I can catch you up on this next week. I think we can, and should, run this by HQ then. I have already given them a heads up.

From: Mendelman, Krista

Sent: Wednesday, May 02, 2018 3:53 PM

To: Thiesing, Mary <Thiesing.Mary@epa.gov>; LaCroix, Matthew <LaCroix.Matthew@epa.gov>

Subject: RE: Meeting request for RA on Donlin

Mary Anne,

Thank you for filling out the meeting request form for the RA briefing. Not knowing the project, the summary seems complete and thorough. David gave me a folder with some background and letters so I will take a look through that to understand the history a bit better.

I will send Jill an email and make sure she is aware of this and talk to her about the coordination needed. She is back tomorrow.

I talked to David specifically about briefing the RA and he had 2 responses... first – let's move ahead with the briefing request sooner than later (which is what you are already doing) looking to schedule the briefing about a week before comments are due and second - that his was skeptical about our ability to get on the RA's calendar given his heavy travel schedule but it is worth a try.

Given that, when you and Matt are ready, go ahead and send the request directly on to David and cc me and Jill.

Thank you,

Krista

Krista Mendelman US EPA Region 10 MS:OWW-193 1200 6th Ave. Suite 900 Seattle WA 98101 206-553-1571

From: Thiesing, Mary

Sent: Wednesday, May 02, 2018 2:36 PM

To: Mendelman, Krista < Mendelman. Krista@epa.gov>; LaCroix, Matthew < LaCroix. Matthew@epa.gov>

Subject: Meeting request for RA on Donlin

Krista and Matt.

Attached is the meeting request for briefing the RA on Donlin prior to our comment letter (I will take a crack at the briefing paper afterward, but we need to get this up ASAP). Matt, can you take a look and just make sure I have all the facts correct? I know how busy you are right now and hate to even ask, but you are the only one who can do it. Krista, when you are satisfied, we can run this past Linda and David, make sure we have identified all the appropriate parties who should be there, and get it up to the RA's office—Linda Erickson would be the person in charge to schedule the meeting. You probably also want to give Jill Nogi a heads-up on this, since her group (primarily Mark Jen) is preparing the agency's NEPA comments. Our 404 comments will require a separate letter since we are recommending maintaining our objections under 404(q), but they should be kept in the loop, and that is probably more appropriate coming from you,

Let me know your thoughts. I am finishing my day in about ½ hour, but can get to it early tomorrow am.

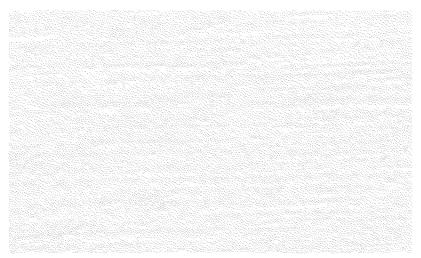
Thanks, guys. I should see you (sort of) next week.

Mary Anne Thiesing Regional Wetland Ecologist (206) 553-6114 (206) 375-4772 (cell) thiesing.mary@epa.gov To: Allnutt, David[Allnutt.David@epa.gov]; Anderson-Carnahan, Linda[Anderson-Carnahan.Linda@epa.gov]
Cc: Thiesing, Mary[Thiesing.Mary@epa.gov]; Nogi, Jill[nogi.jill@epa.gov]; Jen, Mark[Jen.Mark@epa.gov]

From: Mendelman, Krista

Sent: Thur 5/3/2018 3:05:18 PM

Subject: Meeting request for RA on Donlin 404 Permit R10 ORA Meeting Request Form Donlin 5-1-2018.docx



David and Linda,

Attached please find the draft RA meeting request for a briefing on the Donlin 404 Permit. If this is acceptable, we are ready to move it on to the RAs office and Linda Erickson for scheduling with Chris (ideally) or Michelle. Mary Anne is also wanting to make sure there is time to brief HQ because of the controversial nature of this project. She has ready given them a heads up.

Christine scheduled a briefing for you on Thursday, May 10 at 3:00.

I am hoping to coordinate with Jill on this in the next day or so when she is ready to pick this up.

Krista

Krista Mendelman US EPA Region 10 MS:OWW-193 1200 6th Ave. Suite 900 Seattle WA 98101 206-553-1571

From: Thiesing, Mary

Sent: Wednesday, May 02, 2018 2:36 PM

To: Mendelman, Krista <Mendelman.Krista@epa.gov>; LaCroix, Matthew <LaCroix.Matthew@epa.gov>

Subject: Meeting request for RA on Donlin

Krista and Matt,

Attached is the meeting request for briefing the RA on Donlin prior to our comment letter (I will take a crack at the briefing paper afterward, but we need to get this up ASAP). Matt, can you take a look and just make sure I have all the facts correct? I know how busy you are right now and hate to even ask, but you are the only one who can do it. Krista, when you are satisfied, we can run this past Linda and David, make sure we have identified all the appropriate parties who should be there, and get it up to the RA's office—Linda Erickson would be the person in charge to schedule the meeting. You probably also want to give Jill Nogi a heads-up on this, since her group (primarily Mark Jen) is preparing the agency's NEPA comments. Our 404 comments will require a separate letter since we are recommending maintaining our objections under 404(q), but they should be kept in the loop, and that is probably more appropriate coming from you,

Let me know your thoughts. I am finishing my day in about ½ hour, but can get to it early tomorrow am.

Thanks, guys. I should see you (sort of) next week.

Mary Anne Thiesing

Regional Wetland Ecologist (206) 553-6114 Personal Privacy / Ex. 6 | Cell) thiesing.mary@epa.gov



Meeting/Event Request for Region 10 - Office of the Regional Administrator

Please submit this form for any official briefings/updates for the RA/DRA or event attendance requests.

Today's Date:
1 May 2018
Requesting Office:
OERA
Title/Topic of the Meeting/Event (please define any acronyms):
Donlin Gold Clean Water Act Section 404 permit
Administrator on December Administrator on Dech 2
Administrator or Deputy Administrator or Both? Both
Вош
Purpose (informational, decisional, other):
Informational, some strategic decisions
Role of RA/DRA:
Obtain update on project; approve proposed path forward; identify messaging/outreach strategy
Last possible date for the meeting (if urgent, explain why) or date of event:
May 25, 2018—Comment letter on Special Public Notice is due to the Corps on May 29.
Requested Time Length:
45 minutes
EPA Staff (Required):
David Allnutt, Krista Mendelman/Michael Szerlog, Matt LaCroix, Mary Anne Thiesing, Ashley Palomaki, Mark
Jen, Jill Nogi, Tami Fordham; Marianne Holsmann/staff
,
EPA Staff (Optional):
Cara Steiner-Reilly, Staff from Tribal unit
External Participants (please provide email address and/or point of contact):
None
Audio Line or Video Conference or other technology needs required (provide details)?
Video Conference to Raven in AOO; Audio line
· · · · · · · · · · · · · · · · · · ·
Point of Contact for the Meeting:
Mary Anne Thiesing, X 3-6114; Matthew LaCroix, X1-1480

NOTE: Please submit Meeting Requests to R10-ORA@epa.gov and copy your OD/Associate. All briefing materials must

be provided by 3:00 pm three days before your meeting or the meeting may be rescheduled.

On April 27, 2018, the U.S. Army Corps of Engineers, Alaska District issued Special Public Notice SPN-1995-120, announcing the availability of the Final Environmental Impact Statement for the proposed Donlin Gold Mine, which would be located 10 miles north of the Village of Crooked Creek, Alaska, within the watershed of the Kuskokwim River and associated tributaries. The SPN also requested comments on the applicant's proposed Compensatory Mitigation Plan, which was provided as an Appendix to the FEIS, and which describes several permittee-responsible compensatory mitigation proposals by which the applicant proposes to offset the project's impacts to Waters of the U.S., including streams, wetlands, and marine resources.

A Public Notice of the Section 404/10 application for the proposed project was originally issued in early 2016, along with a Draft EIS. At that time, there was no jurisdictional determination by the Corps which identified the extent of waters and wetlands which would likely be lost or otherwise impacted by the mine and its associated infrastructure, and so there was no way to determine with any certainty what the magnitude of the impacts would be. There was also no compensatory mitigation plan provided. The EPA, which is a cooperating agency on the EIS, submitted comments on the Draft EIS pursuant to its responsibilities under the National Environmental Policy Act. We also submitted, under separate cover, comments on the Section 404 application, and notified the District that we had identified the proposed project as one which could cause substantial and unacceptable adverse effects to an Aquatic Resource of National Importance, namely, the Kuskokwim River and its associated tributaries Crooked Creek, American Creek and Anaconda Creek. A §404(q) Part IV 3(a) letter was sent on May 31, 2016, which was followed on June 27, 2016 with a Part IV 3(b) letter, which stated that the proposed project would cause substantial and unacceptable adverse effects, and requested that the District notify us should the Corps choose to issue a permit for the proposed project.

We have continued to coordinate with the Corps through the development of the FEIS. In January of 2017, the Corps confirmed a preliminary Jurisdictional Determination. In addition, Donlin has made some modifications to its project design. The proposed project would include all mining facilities (e.g., open pit, waste rock facility, overburden storage pile and tailings storage facility) east of Crooked Creek; a proposed Jungjuk (Anyaruaq) Port site approximately 178-river miles upstream of Bethel and about 57-river miles upstream of Aniak, an All-Season Access Road between the port and mine site, an Airstrip, and housing facility (camp); and a 315-mile natural gas pipeline and associated pipeline-related facilities from Cook Inlet (near Beluga) to the proposed mine area which would provide natural gas for power generation, project heat and general energy demands. The proposed project would require placement of 4,368,300-cubic yards of fill within 3,415-acres of wetlands and 226,190linear feet of WOTUS; 538 acres and 53,346-linear feet of stream losses are classified by the applicant as temporary short-term impacts to WOTUS, which would be restored concurrently or immediately after construction of the proposed project, which is approximately 4 years. The Section 10 impacts to navigable waters include 3-acres and 11,975-linear feet of WOTUS. In addition, surface and groundwater in drainages below the mine would be decreased during mine operations, resulting in secondary impacts due to lowered flow in stream drainages, which would likely reverberate downstream. Following the effective life of the mine (approximately 27 years), mine closure would occur, during which facilities would be decommissioned and removed, areas reclaimed, underground areas plugged, and a water management plan implemented for the pit lake and tailings facility would be implemented. The TSF would require management and monitoring in perpetuity.

The Compensatory Mitigation Plan which was submitted as part of the FEIS is still undergoing development. At present, it comprises two Permittee-responsible components; viz., the restoration and preservation of areas comprising approximately 101.7-acres of wetlands and riparian areas with 8,501-linear feet (1.61-miles) of stream, and establishment of another 71.0-acres of riparian preservation buffers, in historical placer mining areas in the Upper Crooked Creek watershed. In addition, a total of 5,888-acres, including approximately 2,558-acres of wetlands and ponds, and an additional 3,330-acres of upland riparian areas, stream area, and buffers, and 228,325-linear feet (43.24-miles) of streams in the Chuitna watershed are proposed to be preserved.

NOTE: Please submit Meeting Requests to R10-ORA@epa.gov and copy your OD/Associate. All briefing materials must be provided by 3:00 pm three days before your meeting or the meeting may be rescheduled.

The information in the FEIS is still not complete for the purpose of determining whether the proposed project would cause or contribute to significant degradation of Waters of the U.S. If the Corps makes such a finding, it must deny the permit. We have identified a number of measures which might, if enacted, offset the worst of the proposed project's impacts. We believe that our comment letter should identify the information still needed to allow a complete review, and also offer suggestions on all of the measures which could offset the worst of the project's impacts. However, we believe at this time, given the still-incomplete information as well as the need for further measures to reduce project impacts, that it would be imprudent to remove the 404(q) status of the proposed project. The proposed project has been of great interest to both the governor of the state, as well as all members of the Alaska Congressional delegation. NOTE: Please submit Meeting Requests to R10-ORA@epa.gov and copy your OD/Associate. All briefing materials must be provided by 3:00 pm three days before your meeting or the meeting may be rescheduled.

To: Nogi, Jill[nogi.jill@epa.gov]; Allnutt, David[Allnutt.David@epa.gov]

From: Jen, Mark

Sent: Wed 8/23/2017 8:45:19 PM

Subject: RE: Jen, Mark has shared '1 - PFEIS DONLIN EPA Comment Table 2017'

I would recommend that when we meet with the Corps/Donlin, at that time, we should verbally ask for an extension based on these additional concerns.

Thanks

Mark

From: Nogi, Jill

Sent: Wednesday, August 23, 2017 12:24 PM

To: Jen, Mark <Jen.Mark@epa.gov>; Allnutt, David <Allnutt.David@epa.gov> **Subject:** RE: Jen, Mark has shared '1 - PFEIS DONLIN EPA Comment Table 2017'

Thanks for sharing the two tables in progress, Mark. And thank you too for organizing our large group of reviewers and managers to start discussing what you're hearing from the Associate Reviewers on the Preliminary Final EIS. It was helpful to hear what folks are thinking about today.

Given that we'd like to have another internal meeting to discuss the current concerns and recommendations AND that we'd like to also meet with the Corps and Donlin prior to sharing our comments, do you think that there's any merit to asking for more time to respond to the Corps? Perhaps an extra week, as that may help us with 1) scheduling the external meeting (I suggest that we should think carefully about who needs to be there, as not everyone really does – and it will make it almost impossible to schedule the more people we plan to include) and 2) finalizing our comment tables, since it sounds like we'd like to provide the Corps with both tables at this point. I'm wondering too about any work on our end to line those 2 tables up so that they hopefully say the same thing in different ways. I wouldn't want us to confuse things by sending both tables and making completely different comments between them.

What do you both think about a potential extension request? Thanks!

Jill

From: Jen, Mark [mailto:no-reply@sharepointonline.com]

Sent: Wednesday, August 23, 2017 1:11 PM

To: Allnutt, David <Allnutt.David@epa.gov>; Nogi, Jill <nogi.jill@epa.gov>

Cc: Jen, Mark < Jen. Mark@epa.gov>

Subject: Jen, Mark has shared '1 - PFEIS DONLIN EPA Comment Table 2017'

Here is a link to the PFEIS - EPA Comment Table.

This and the EPA DEIS Response-Comment Table are both a work in progress, This does not have everyone's review comments loaded on the Table at this time.

Let me know if you have any questions.

Thanks

Mark

Open 1 - PFEIS DONLIN EPA Comment Table 2017.docx

See more related to Jen, Mark in Delve.

Get the SharePoint mobile app!



To: LaCroix, Matthew[LaCroix.Matthew@epa.gov]; Thiesing, Mary[Thiesing.Mary@epa.gov]; Godsey,

Cindi[Godsey.Cindi@epa.gov]; Kissinger, Lon[Kissinger.Lon@epa.gov]; Eckley, Chris[Eckley.Chris@epa.gov]; Repasky, Ted[repasky.ted@epa.gov]; Thomas, Lee[Thomas.Lee@epa.gov]; McAlpine, Jerrold[McAlpine.Jay@epa.gov]; Pepple,

Karl[Pepple.Karl@epa.gov]; Grass, Running[Grass.Running@epa.gov]

Cc: Mendelman, Krista[Mendelman.Krista@epa.gov]; Bachman, Brenda[bachman.brenda@epa.gov]; Fordham,

Tami[Fordham.Tami@epa.gov]; Allnutt, David[Allnutt.David@epa.gov]; Palomaki, Ashley[Palomaki.Ashley@epa.gov]; Steiner-Riley, Cara[Steiner-Riley.Cara@epa.gov]; Lidgard, Michael[Lidgard.Michael@epa.gov]; McFadden, Kelly[McFadden.Kelly@epa.gov]; Philip, Jeffrey[Philip.Jeff@epa.gov]

From: Jen, Mark

Sent: Fri 4/27/2018 7:47:21 PM

Subject: RE: DONLIN GOLD PROJECT FINAL EIS - Documents are on the SharePoint Site (Technical/Program Review Comments

due COB May 9)

Happy Friday!

Hope you all had a great week? Hopefully you have started reviewing the Donlin Gold FEIS on the SharePoint Site.

There are some updates that I wanted to share with you all regarding the Donlin Gold Project Final EIS...

The Notice of Availability of the Donlin Gold Project Final EIS was published in the Federal Register today! The link to the FR notice is here:

https://www.gpo.gov/fdsys/pkg/FR-2018-04-27/pdf/2018-08864.pdf

Concurrent with the FR Notice, the U.S. Army Corps of Engineers issued a Special Public Notice to notify the public that (1) the Corps has completed and made available to the public a Final Environmental Impact Statement (FEIS) for the proposed Donlin Gold Project and (2) comments will be accepted on the applicants updated compensatory mitigation plan (FEIS appendices J and M) through a 30 day review period - ending May 29, 2018.

The link to the Corps' SPN is here:

http://www.poa.usace.army.mil/LinkClick.aspx?fileticket=T5xpRky2A Q%3d&portalid=34

Greenwire had an article today regarding the Corps' release of the Donlin Gold Project FEIS. The link is here: https://www.eenews.net/greenwire/2018/04/27/stories/1060080337

If you have any questions regarding the review of the Donlin Gold FEIS, please do not hesitate to contact me.

Have a great weekend!



Mark S. Jen
U.S. Environmental Protection Agency R10
Alaska Operations Office
222 W. Seventh Avenue, #19
Anchorage, Alaska 99513-7588
(907) 271-3411

From: Jen, Mark

Sent: Friday, April 20, 2018 2:41 PM

To: LaCroix, Matthew <LaCroix.Matthew@epa.gov>; Thiesing, Mary <Thiesing.Mary@epa.gov>; Godsey, Cindi <Godsey.Cindi@epa.gov>; Kissinger, Lon <Kissinger.Lon@epa.gov>; Eckley, Chris <Eckley.Chris@epa.gov>; Repasky, Ted <repasky.ted@epa.gov>; Thomas, Lee <Thomas.Lee@epa.gov>; McAlpine, Jerrold <McAlpine.Jay@epa.gov>; Pepple, Karl <Pepple.Karl@epa.gov>; Grass, Running <Grass.Running@epa.gov>

Cc: Mendelman, Krista <Mendelman.Krista@epa.gov>; Bachman, Brenda <bachman.brenda@epa.gov>; Fordham, Tami <Fordham.Tami@epa.gov>; Combes, Marcia <Combes.Marcia@epa.gov>; Allnutt, David <Allnutt.David@epa.gov>; Palomaki, Ashley <Palomaki.Ashley@epa.gov>; Steiner-Riley, Cara <Steiner-Riley.Cara@epa.gov>; Lidgard, Michael

<Lidgard.Michael@epa.gov>; McFadden, Kelly <McFadden.Kelly@epa.gov>; Philip, Jeffrey <Philip.Jeff@epa.gov>

Subject: DONLIN GOLD PROJECT FINAL EIS - Documents are on the SharePoint Site (Technical/Program Review Comments due COB

Happy Friday!

This afternoon, the Alaska Dispatch News (ADN) article indicated that the U.S. Army Corps of Engineers to publish final Donlin Mine environmental review - April 27.

https://www.adn.com/alaska-news/2018/04/20/army-corps-to-publish-final-donlin-mine-environmental-review-april-27/

EPA has received the Donlin Gold Project Final EIS in advance of the April 27 Federal Register Notice of Availability. (PLEASE DO NOT DISTRIBUTE).

We now have an additional week to review the FEIS and to submit our comments. The documents are located on our SharePoint Site under the file "FINAL EIS – DONLIN." Hardcopies will be distributed to Seattle (c/o Jill Nogi) and Anchorage (c/o Mark Jen) next week.

Click on the link below to access the Donlin Gold Project FEIS:

Go to Donlin Gold Project EIS Team

Follow this site to get updates in your newsfeed.

EPA COMMENTS - DEIS AND PFEIS

I have included our comments on the DEIS and the PFEIS in the folder "2 – EPA Comments on the DEIS & PFEIS."

REVIEW COMMENTS

In terms of your written review comments, we would accept them in any format that is convenient for you:

- (1) **Narrative Format** If you would like to provide a detailed narrative of your comments/issues, feel free to email those comments to me and the team focus your review on the major comments that were made during the DEIS and/or the PFEIS; or
- (2) **Table Format** If you would like to respond to comments that were made on the Draft and PFEIS, there are two tables in the folder "1 FEIS Comment Tables." You can enter your review comments directly into the table for the DEIS and the PFEIS on the SharePoint Site. These tables will not be provided to the Corps, but will be used to develop our formal comments on the FEIS.

REMINDER: Focus your comments on the major big issues from our comments on the DEIS and the PFEIS. Do not bring up any new issues/concerns, unless it is regarding new information, analysis, date, modelling, etc. that was not previously included in the DEIS or PFEIS. We will have to agree to disagree on some of the minor issues that are not addressed in the FEIS.

SCHEDULE

As described in Jill's email below, here is our review schedule. Your comments need to be completed/submitted to me no later than COB Wednesday, May 9th (in 2.5 weeks). Comments received after this date run the risk of not being included in EPA's final comment letter. Comments received prior to this date are highly encouraged.

April 27 (Friday)	NOA of the Final EIS
May ♀ (Wednesday)	Technical/Program Reviewers Provide Comments by COB Wednesday May 9th
May 14 (Monday)	Draft EPA Comment Letter to Jill by COB May 14th
May 17 (Thursday)	Management and Legal Review Complete (Jill, David, Ashley) by COB May 17th
May 18-23 (Friday -	HQ Review (OFA, Water) and back to R10 by COB

on Wednesday May 23rd
Comments due to the Corps by COB Friday

Please do not hesitate to contact me if you have any questions. Have a great weekend!

Thanks



Mark S. Jen
U.S. Environmental Protection Agency R10
Alaska Operations Office
222 W. Seventh Avenue, #19
Anchorage, Alaska 99513-7588
(907) 271-3411

From: Nogi, Jill

Sent: Friday, April 06, 2018 9:43 AM

To: Jen, Mark < Jen.Mark@epa.gov >; LaCroix, Matthew < LaCroix.Matthew@epa.gov >; Thiesing, Mary < Thiesing.Mary@epa.gov >; Godsey, Cindi < Godsey.Cindi@epa.gov >; Kissinger, Lon < Kissinger.Lon@epa.gov >; Eckley, Chris < Eckley.Chris@epa.gov >; Repasky, Ted < repasky.ted@epa.gov >; Thomas, Lee < Thomas.Lee@epa.gov >; McAlpine, Jerrold < McAlpine.Jay@epa.gov >; Pepple, Karl < Pepple.Karl@epa.gov >; Grass, Running < Grass.Running@epa.gov >

Cc: Szerlog, Michael <Szerlog.Michael@epa.gov>; Thiesing, Mary <Thiesing.Mary@epa.gov>; Bachman, Brenda

<bachman.brenda@epa.gov>; Fordham, Tami <Fordham.Tami@epa.gov>; Combes, Marcia <Combes.Marcia@epa.gov>; Allnutt, David <Allnutt.David@epa.gov>; Palomaki, Ashley <Palomaki.Ashley@epa.gov>; Steiner-Riley, Cara <Steiner-Riley.Cara@epa.gov>; Lidgard, Michael <Lidgard.Michael@epa.gov>; McFadden, Kelly <McFadden.Kelly@epa.gov>; Philip, Jeffrey <Philip.Jeff@epa.gov> Subject: RE: Donlin Gold Project Final EIS - Expected Release date of April 27, 2018

Hello again Donlin Team -

I wanted to follow up on Mark's message from last week. We anticipate having access to the Final EIS beginning 3 weeks from today, on April 27th. If that's going to change, we hope to know that at least a week in advance, and we will communicate with you.

I've talked with Mark about the multiple levels of review that our Final EIS letter is going to go through, and that we need to tweak his review schedule slightly – such that we receive all of HQ comments on the letter by COB Wednesday, May 23rd. The Region will need a few days after the letter comes back from HQ to get it ready to send out to the Corps on Friday May 25th. With that in mind, everything else will shift as well. I would appreciate the technical review and comments from associate reviewers provided to Mark by COB Wednesday, May 9th. We are not in a position to accept additional input from associate reviewers after that time.

We understand that it is a tight timeframe in which to review the FEIS, which is why Mark has shared (links below) the comments that EPA provided to the Corps at the Draft EIS stage as well as the comments that we provided last September on the Preliminary Final EIS. We are not anticipating much, if any, changes to the document since your PFEIS review, and we are hopeful that during this 3-week period leading up to our final review you will all re-familiarize yourselves with the concerns and suggestions that we've raised previously.

One last note that we greatly appreciate and value your participation and your input in this process. Thank you for being part of this environmental review! In case you haven't been part of a NEPA review in some time, please understand that Mark and I will make the determination about what's ultimately included in our letter to the Corps. We will share the final letter after it goes out. If you have any questions on the process or the schedule, please feel free to contact Mark or I as soon as possible.

Jill

April 27 (Friday)	NOA of the Final EIS
May 9 (Wednesday)	Technical/Program Reviewers Provide Comments by COB Wednesday May 9th
May 14 (Monday)	Draft EPA Comment Letter to Jill by COB May 14th
May 17 (Thursday)	Management and Legal Review Complete (Jill, David, Ashley) by COB May 17th
May 18-23 (Friday - Wednesday)	HQ Review (OFA, Water) and back to R10 by COB on Wednesday May 23rd
May 25 (Friday)	Comments due to the Corps by COB Friday

From: Jen, Mark

Sent: Friday, March 30, 2018 1:39 PM

To: LaCroix, Matthew < LaCroix.Matthew@epa.gov >; Thiesing, Mary < Thiesing.Mary@epa.gov >; Godsey, Cindi < Godsey.Cindi@epa.gov >; Kissinger, Lon < Kissinger.Lon@epa.gov >; Eckley, Chris < Eckley.Chris@epa.gov >; Repasky, Ted < repasky.ted@epa.gov >; Thomas, Lee < Thomas.Lee@epa.gov >; McAlpine, Jerrold < McAlpine.Jay@epa.gov >; Pepple, Karl < Pepple.Karl@epa.gov >; Grass, Running < Grass.Running@epa.gov >

Cc: Nogi, Jill <nogi.jill@epa.gov>; Szerlog, Michael <<u>Szerlog.Michael@epa.gov</u>>; Bachman, Brenda <<u>bachman.brenda@epa.gov</u>>; Fordham, Tami <<u>Fordham.Tami@epa.gov</u>>; Combes, Marcia <<u>Combes.Marcia@epa.gov</u>>; Allnutt, David <<u>Allnutt.David@epa.gov</u>>; Palomaki, Ashley Palomaki, Ashley@epa.gov>; Steiner-Riley, Cara Steiner-Riley.Cara@epa.gov>

Subject: Donlin Gold Project Final EIS - Release date April 27, 2018

Happy Good Friday!

The Corps of Engineers indicated that the new date for publishing the Notice of Availability of the Donlin Gold Project Final EIS in the Federal Register is April 27.

The Corps received BLM's ANILCA § 810 Analysis regarding their subsistence findings. The Corps' contractor, AECOM, will need more time to reevaluate the subsistence sections in the FEIS in light of BLM's ANILCA § 810 analysis.

Unless the April 27 release date changes again, I am requesting your review comments by **COB Friday, May 11** (two weeks). (If you need more time, then Monday, May 14 is the absolute latest. Comments received after that time may risk not being included in EPA's final comment letter).

DONLIN GOLD PROJECT FINAL EIS REVIEW SCHEDULE

April 27 (Friday)	NOA of the Final EIS
May 11 (Friday)	Technical/Program Reviewers Provide Comments
May 15 (Tuesday)	Draft EPA Comment Letter
May 16 (Wednesday)	Management Review (Jill, David et al.)
May 18 (Friday)	Legal Review (Ashley?)
May 21 (Monday)	HQ Review (OFA, Water)

May 25 (Friday) Comments due to the Corps

As we approach the April 27 release date, I will send out another email reminder.

Please do not hesitate to contact me with any questions and/or concerns.

Thanks

Mark



Mark S. Jen
U.S. Environmental Protection Agency R10
Alaska Operations Office
222 W. Seventh Avenue, #19
Anchorage, Alaska 99513-7588
(907) 271-3411

From: Jen, Mark

Sent: Monday, March 26, 2018 7:36 AM

To: Matthew LaCroix <<u>LaCroix.Matthew@epa.gov</u>>; Thiesing, Mary <<u>thiesing.mary@epa.gov</u>>; Godsey, Cindi <<u>Godsey.Cindi@epa.gov</u>>; Kissinger, Lon <<u>Kissinger.Lon@epa.gov</u>>; Eckley, Chris <<u>Eckley.Chris@epa.gov</u>>; Repasky, Ted <<u>repasky.ted@epa.gov</u>>; Thomas, Lee <<u>Thomas.Lee@epa.gov</u>>; McAlpine, Jerrold <<u>McAlpine.Jay@epa.gov</u>>; 'Karl Pepple (<u>Pepple.Karl@epa.gov</u>)' <<u>Pepple.Karl@epa.gov</u>>; Grass, Running <<u>Grass.Running@epa.gov</u>>

Cc: Nogi, Jill <nogi.jill@epa.gov>; Szerlog, Michael <<u>Szerlog.Michael@epa.gov</u>>; Bachman, Brenda <<u>bachman.brenda@epa.gov</u>>; Owens, Kim <<u>Owens.Kim@epa.gov</u>>; Fordham, Tami <<u>Fordham.Tami@epa.gov</u>>; Combes, Marcia <<u>Combes.Marcia@epa.gov</u>>;

Allnutt, David < Allnutt. David@epa.gov>

Subject: RE: Donlin Gold Project Final EIS - DELAYED

Importance: Low

Greetings Everyone,

The Corps has indicated a delay in the publication of the Final EIS, which was originally anticipated on Friday, March 23. They are waiting for a particular deliverable from BLM before filing the FEIS for publication of the Notice of Availability in the Federal Register.

We are anticipating the release of the Donlin Gold Final EIS in early/mid-April. We should know a week prior to the release of the FEIS. The EPA project review schedule will be adjusted at that time to accommodate the new timeline.

Thanks for your patience!

Mark

From: Jen, Mark

Sent: Wednesday, March 07, 2018 9:07 PM

To: Matthew LaCroix < LaCroix.Matthew@epa.gov >; Thiesing, Mary < thiesing.mary@epa.gov >; Godsey, Cindi < Godsey.Cindi@epa.gov >; Kissinger, Lon < Kissinger.Lon@epa.gov >; Eckley, Chris < Eckley.Chris@epa.gov >; Repasky, Ted < Thomas.Lee@epa.gov >; McAlpine, Jerrold < McAlpine.Jay@epa.gov >; Karl Pepple (Pepple.Karl@epa.gov) '< Pepple.Karl@epa.gov >; Grass, Running < Grass.Running@epa.gov >

Cc: Nogi, Jill <<u>nogi.jill@epa.gov</u>>; Szerlog, Michael <<u>Szerlog.Michael@epa.gov</u>>; Bachman, Brenda <<u>bachman.brenda@epa.gov</u>>; Owens, Kim <<u>Owens.Kim@epa.gov</u>>; Fordham, Tami <<u>Fordham.Tami@epa.gov</u>>; Combes, Marcia <<u>Combes.Marcia@epa.gov</u>>;

Allnutt, David < Allnutt. David@epa.gov>

Subject: RE: Donlin Gold Project Final EIS - Proposed EPA Project Review Schedule

Greetings Everyone!

In preparation for our review of the Donlin Gold Project Final EIS, I am proposing the following review schedule. This schedule is based on the Corps releasing the FEIS on Friday, March 23 and is subject to change if we receive the FEIS at a later date.

I am requesting your review comments be completed by **COB Friday, April 6**. (If you need more time, then Monday, April 9 is the absolute latest. Comments received after that time run the risk of not being included in EPA's final comment letter).

DONLIN GOLD PROJECT FINAL EIS REVIEW SCHEDULE

April 6 – Technical/Program Reviewers Provide Comments

April 10 – Draft EPA Comment Letter Prepared

April 10 – Legal Review (Kim)

April 12 – Management Review (Jill, David et al.)

April 16 – HQ Review (OFA, Water)

April 23 – Comments provided to the Corps

In addition to our comments on the Draft EIS (link provided in previous email message below), I encourage everyone to review our comments on the Preliminary FEIS in preparation for the FEIS review. Below is a link to EPA's comments on the Preliminary Final EIS located on our SharePoint Site.

Please do not hesitate to contact me with any questions and/or concerns.

Thanks

Mark

Here's the document that Jen, Mark shared with you.

Open 1- EPA Comments PFEIS DONLIN Gold 9-11-2017.docx

See more related to Jen, Mark in Delve.





From: Jen, Mark

Sent: Monday, March 05, 2018 9:49 AM

To: Matthew LaCroix < LaCroix.Matthew@epa.gov >; Thiesing, Mary < thiesing.mary@epa.gov >; Godsey, Cindi < Godsey.Cindi@epa.gov >; Kissinger, Lon < Kissinger.Lon@epa.gov >; Eckley, Chris < Eckley.Chris@epa.gov >; Repasky, Ted < repasky.ted@epa.gov >; Thomas, Lee < Thomas.Lee@epa.gov >; McAlpine, Jerrold < McAlpine.Jay@epa.gov >; Karl Pepple (Pepple.Karl@epa.gov) '< Pepple.Karl@epa.gov >; Grass, Running < Grass.Running@epa.gov >

Cc: Nogi, Jill <nogi.jill@epa.gov>; Szerlog, Michael <<u>Szerlog.Michael@epa.gov</u>>; Bachman, Brenda <<u>bachman.brenda@epa.gov</u>>; Fordham, Tami <<u>Fordham.Tami@epa.gov</u>>; Combes, Marcia <<u>Combes.Marcia@epa.gov</u>>; Allnutt, David <<u>Allnutt.David@epa.gov</u>>

Subject: Donlin Gold Project Final EIS - EPA Review

Greetings Everyone!

I am passing along a recent article regarding the Donlin Gold Project released on Friday.

E&E News Greenwire

To follow up, this is an early reminder that the Donlin Gold Project Final EIS is expected to be released at the end of this month - March 23, 2016. The U.S. Army Corps of Engineers will provide a 30-day wait period, which is the timeframe for EPA to prepare formal comments on the FEIS. Due to the legal, management, and potential HQ reviews of our FEIS comments, we will have **about two weeks** to review the document so that we can prepare our draft letter on the FEIS. More details to follow when we are certain of the release date of the Final EIS.

Here are my preliminary thoughts regarding the FEIS review. Due to the quick turnaround, we do not need to identify any new comments. I encourage everyone to focus their primary review on our comments from the Draft EIS. The link to EPA's May 31, 2016 DEIS Comments on the SharePoint Site is below. Our comments from the Preliminary FEIS should be evaluated within the context of our DEIS comments.

I plan to format EPA's DEIS comments into a Comment Table. Based on your review of the FEIS, determine whether our DEIS comments have been addressed or not. If not, then provide your recommendations for how the comment should be addressed in the Corps' Record of Decision (ROD). More details regarding our review process to follow.

I have requested a hardcopy of the FEIS be sent to the EPA Anchorage and Seattle Offices, including two DVD copies. I will also be uploading the electronic copy of the FEIS to our SharePoint Site. If you would like to review the hard copies, they will be delivered to me (1-3411) in Anchorage and Jill Nogi (3-1841) in Seattle. Please contact either one of us to check out the hard copy and/or the DVD.

Lastly, I will be out of the office from March 8 to March 26. As a Response Support Corps member, I am deploying to EPA Region 2 to support the hurricane response. I will be based in the Regional Emergency Operations Center in Edison, NJ. I will be checking/responding to emails periodically during this time

Let me know if you have any questions.

Thanks!



Mark S. Jen
U.S. Environmental Protection Agency R10
Alaska Operations Office
222 W. Seventh Avenue, #19
Anchorage, Alaska 99513-7588
(907) 271-3411

EPA's May 31, 2016 Comments – Draft EIS

Here's the document that Jen, Mark shared with you.

Open Donlin Gold DEIS - EPA Comments 5_31_2016.pdf See more related to Jen, Mark in Delve.

Get the SharePoint mobile app!





To: Allnutt, David[Allnutt.David@epa.gov]; Nogi, Jill[nogi.jill@epa.gov]

Cc: Jen, Mark[Jen.Mark@epa.gov]

From: Jen, Mark

Sent: Wed 8/23/2017 8:05:08 PM

Subject: Jen, Mark has shared '2 - DEIS DONLIN EPA Comment-Response Table'

Per your request. Below is a link to the Donlin Gold Project SharePoint Site - DEIS EPA Comment-Response Table.

This includes our formal 309 letter and comment table.

Let me know if you have any questions.

Open 2 - DEIS DONLIN EPA Comment-Response Table.docx See more related to Jen, Mark in Delve.





To: Allnutt, David[Allnutt.David@epa.gov]

From: Littleton, Christine

Sent: Tue 9/13/2016 6:09:23 PM

Subject: RE: FRIENDLY REMINDER: Draft Agenda: Donlin Gold Project Meeting with the Calista Corporation

Deliberative Process / Ex. 5

Teena Littleton

(formerly Reichgott)

Manager, Environmental Review and Sediment Management Unit

Office of Environmental Review and Assessment

EPA Region 10 OERA-202-3 1200 Sixth Avenue, Suite 900

Seattle, WA 98101-3140

206-553-1601

littleton.christine@epa.gov

From: Allnutt, David

Sent: Monday, September 12, 2016 6:25 PM

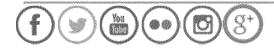
To: Littleton, Christine < Littleton. Christine@epa.gov>

Subject: RE: FRIENDLY REMINDER: Draft Agenda: Donlin Gold Project Meeting with the Calista Corporation

Deliberative Process / Ex. 5



R. David Allnutt, Director
Office of Environmental Review and Assessment
U.S. EPA, Region 10
1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140
(206) 553-2581



From: Littleton, Christine

Sent: Monday, September 12, 2016 4:54 PM **To:** Allnutt, David < <u>Allnutt.David@epa.gov</u>>

Subject: RE: FRIENDLY REMINDER: Draft Agenda: Donlin Gold Project Meeting with the Calista Corporation

Deliberative Process / Ex. 5

Teena Littleton

(formerly Reichgott)

Manager, Environmental Review and Sediment Management Unit

Office of Environmental Review and Assessment

EPA Region 10 OERA-202-3 1200 Sixth Avenue, Suite 900 Seattle, WA 98101-3140

206-553-1601

littleton.christine@epa.gov

From: Allnutt, David

Sent: Monday, September 12, 2016 4:11 PM

To: Szerlog, Michael <Szerlog.Michael@epa.gov>; Jen, Mark <Jen.Mark@epa.gov>

Cc: Soderlund, Dianne < Soderlund. Dianne@epa.gov >; Littleton, Christine < Littleton. Christine@epa.gov >; Pirzadeh, Michelle

<Pirzadeh.Michelle@epa.gov>

Subject: RE: FRIENDLY REMINDER: Draft Agenda: Donlin Gold Project Meeting with the Calista Corporation

Yes – I'm fine with this agenda as modified by Dianne and with taking Michael's and Matt's names off of the attendee list. It sounds like we may have ORC participation as well, but I think we can address that at the meeting if someone from ORC attends.



R. David Allnutt, Director
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(206) 553-2581













From: Szerlog, Michael

Sent: Monday, September 12, 2016 4:06 PM

To: Jen, Mark < Jen. Mark@epa.gov >

Cc: Soderlund, Dianne < Soderlund. Dianne@epa.gov >; Allnutt, David < Allnutt. David@epa.gov >; Littleton, Christine

<Littleton.Christine@epa.gov>; Pirzadeh, Michelle <Pirzadeh.Michelle@epa.gov>

Subject: Re: FRIENDLY REMINDER: Draft Agenda: Donlin Gold Project Meeting with the Calista Corporation

Mark,

I will not be able to attend since have interagency meeting with Oregon. Allnutt is OK with no 404 staff or manager there. He will take down any questions.

Sent from my iPhone

On Sep 12, 2016, at 3:09 PM, Jen, Mark < Jen. Mark@epa.gov > wrote:

<image001.gif>

Hi Dianne,

Thanks for those comments. I have incorporated them in the latest attached version of the Agenda.

Please feel free to provide additional comments on the Agenda.

Mark

From: Soderlund, Dianne

Sent: Monday, September 12, 2016 12:41 PM

To: Jen, Mark < <u>Jen.Mark@epa.gov</u>>; Allnutt, David < <u>Allnutt.David@epa.gov</u>>; Fordham, Tami < <u>Fordham.Tami@epa.gov</u>>; Littleton, Christine < <u>Littleton.Christine@epa.gov</u>>; Szerlog, Michael < Szerlog.Michael@epa.gov>

Cc: Pirzadeh, Michelle < Pirzadeh. Michelle@epa.gov>

Subject: RE: FRIENDLY REMINDER: Draft Agenda: Donlin Gold Project Meeting with the Calista Corporation

Hi Mark.

Thanks

A few suggested edits:

- Tami will not be participating in the meeting as she will be traveling back to Alaska from Seattle at that time.
- I think we should add in the topic "EPA approach to consultation on NEPA-related project" since we specifically reference that we will share this information in the second paragraph of our August 22 response letter.
- Instead of the "Opening Remarks" perhaps we can just say Welcome, and we can prepare a few talking points
 for Michelle. Then we can just move into the topics at hand.

I ask that David and Teena weigh in on the second and third bulleted suggestions before the changes are made, so we can make sure we are of one mind on this meeting.

Dianne Soderlund, Director EPA Region 10 Alaska Operations Office (907) 271-3425

soderlund.dianne@epa.gov

From: Jen, Mark

Sent: Monday, September 12, 2016 12:19 PM

To: Allnutt, David <<u>Allnutt.David@epa.gov</u>>; Soderlund, Dianne <<u>Soderlund.Dianne@epa.gov</u>>; Fordham, Tami <Fordham.Tami@epa.gov>; Littleton, Christine <Littleton.Christine@epa.gov>; Szerlog, Michael

<Szerlog.Michael@epa.gov>

Cc: Pirzadeh, Michelle < Pirzadeh. Michelle@epa.gov>

Subject: FRIENDLY REMINDER: Draft Agenda: Donlin Gold Project Meeting with the Calista Corporation

This is a friendly reminder to provide me with your comments on the draft agenda regarding our meeting with the Calista Corporation on Thursday.

If you can provide me with your changes by COB today (or earlier) that would be great!

Matt Lacroix indicated that he would not be available on Thursday, so I have taken him off the participant's list.

Thanks

From: Jen, Mark

Sent: Friday, September 09, 2016 9:49 AM

To: Allnutt, David <Allnutt.David@epa.gov>; Soderlund, Dianne <Soderlund.Dianne@epa.gov>; Fordham, Tami

<Fordham.Tami@epa.gov>; Erikson, Linda <Erikson.Linda@epa.gov>; Littleton, Christine

<Littleton.Christine@epa.gov>; Michael Szerlog <Szerlog.Michael@epa.gov>; Matthew LaCroix

<<u>LaCroix.Matthew@epa.gov</u>>

Cc: Pirzadeh, Michelle < Pirzadeh. Michelle@epa.gov >

Subject: Draft Agenda: Donlin Gold Project Meeting with the Calista Corporation

Greetings Everyone!

As discussed in the briefing with Michelle yesterday, please find attached the draft agenda for our meeting with Calista Corporation on Thursday, September 15 (2:30 pm PDT/1:30 ADT).

I need your changes/additions to the agenda by COB Monday, September 12 as I plan to share this agenda with Calista for their review prior to our meeting on Thursday.

The list of participants on the EPA side seems quite heavy. Let me know if we should distill this list down a bit.

Thanks and have a great weekend!

Mark S. Jen

U.S. Environmental Protection Agency, Region 10 Alaska Operations Office 222 W. Seventh Avenue #19 Anchorage, Alaska 99513-7588 (907) 271-3411

<EPA & Calista Meeting Agenda (Draft).docx>